

## APPENDIX C3. Pre-Submission Consultation June-August: Breckland Council Comments with STNP Responses

### Saham Toney Neighbourhood Plan

#### Breckland Council comments for the Third Regulation 14 Consultation

##### [STNP Responses](#)

We welcome the additional work that has been involved with the production of the third version of the Reg.14 STNP. We have aimed to make a thorough review of the Plan that has resulted in a number further comments being made, as well as indicating where objections are likely to result where there are still some outstanding fundamental concerns with the Plan. Also we strongly recommend that after further amendments are made to the Plan (as a result of this consultation), it would really benefit from having a detailed proofreading review by another member of the Parish Council to assist this process to resolve such issues before it is submitted to Breckland Council.

<b>No</b>	<b>Page and Policy/ Paragraph No</b>	<b>Comment</b>	<b>Justification</b>	<b>Suggested Amendments</b>
<b>1</b>	Whole Plan - Phrasing	<p>While there has been an overall improvement in the phrasing of most of the policies, there are a few which are becoming too wordy and therefore not so easy to understand.</p> <p>Also there remains concern that a few policies are still too restrictive and will have negative implications for viability.</p>	<p>Succinct, para 15 NPPF.</p> <p>Viability, para 67 NPPF.</p>	<p>All policies to be reviewed to see where they could be streamlined; without such a review, this risks an independent examiner making changes to policy wording.</p>
<p>This is not a specific comment, so no specific response can be made, other than that policies will be subject to a final review as to their succinctness prior to submission. In general terms we do not agree policies as written are too restrictive or will have negative implications for viability (the Council has provided no evidence of the latter implications) and we consider the Council has not taken into account the very detailed justifications given in supporting text, nor has it fully read or paid attention to the 19 documents that were provided as part of the consultation as evidence in support of the Plan</p>				

It is also noted that an independent examiner 'health-checked' the Plan in July 2020				
2*	General - Terminology	<p>It is important to use the correct planning words to ensure that the correct issue is being referred to. e.g. p3, Contents page and the subsequent map titles.</p> <p>Also in planning a 'proposal' is a very general term, where an 'allocation' is for a specific site therefore replace 'proposal' with 'allocation' e.g. p16, 3.7.1, p28, T1.17 I, p60-89, Policies 2H-2Q etc.</p>	Terminology.	<p><i>EVIDENCE MAP 5.2: FORMAL PLANNING PROPOSALS</i></p> <p><b>APPLICATIONS</b> (2013-2019) 117</p> <p><i>EVIDENCE MAP 5.3: OUTLINE DEVELOPMENT PLAN</i></p> <p><b>PROPOSAL FOR RICHMOND PARK GOLF CLUB</b> 118</p> <p>Replace 'proposal(s)' with 'allocation(s)'.</p>
<p>The term 'proposal' was included in policy text for each of the two previous Regulation 14 pre-submissions, and attracted no comment from the Council. 216 occurrences in the Plan of the term 'proposal' have been reviewed and found to be used correctly. Specifically, in the case of the examples given:</p> <p>3.7.1: It is incorrect to amend 'proposal' to 'allocations'. This paragraph is referring to the Local Plan Policy HOU 04, which does not make site allocations, but deals with all proposals that may come forward. No change made.</p> <p>T1.17 deals with any proposal that may come forward, not site allocations exclusively. No change made.</p> <p>Policies 2H-2Q: Allocated sites must still submit proposals prior to being granted permission. No changes made.</p> <p>Evidence Maps 5.2 and 5.3: Amended as recommended</p> <p>The contents page is automatically generated from text in the body of the plan, so is updated in accordance with changes made in body text.</p>				

3		To be consistent with the rest of the Plan, remove the word ' <i>development</i> ' where there is a reference to ' <i>Local Development Plan</i> ' e.g. para 8.2, 8.3, and in the glossary where it appears in relation to the definitions for ' <i>Making of the Plan</i> ' & ' <i>Settlement boundary</i> '.	Consistent terminology.	As advised.
The comment has been implemented in paragraphs 8.2 and 8.3 and in the glossary definition of ' <i>Settlement Boundary</i> '. Elsewhere, the comment fails to recognise the difference between the Local Development Plan and the Local Plan. The latter is merely part of the former. Hence the term ' <i>Local Development Plan</i> ' is used correctly (as the Council refers to it in comment 19) in its remaining 6 occurrences, which have not been changed				
4*		To be consistent with the rest of the Plan, ' <i>NPPF</i> ' should be written as ' <i>National Planning Policy Framework</i> ' e.g. at - p97, T3A.24 b) - e); p149, T7C.3; & p173, T8A.9.	Consistent terminology.	As advised.
All occurrences of ' <i>NPPF</i> ' amended to ' <i>National Planning Policy Framework</i> '				
5*	General - Terminology	Any reference to the NPPF ' <i>dictating</i> ' is incorrect as the ' <i>Basic Conditions</i> ' only require a Plan to have ' <i>regard to</i> ' the Framework.		Replace ' <i>dictates</i> ' with ' <i>states</i> ' e.g. Para T7E.6 and T8.24 & 25.
The specific paragraphs noted have been amended as suggested. The mention of ' <i>e.g.</i> ' against those in the comment is not accurate, since there are no other occurrences of this issue				
6*	General - reference to ' <i>material considerations</i> '	Any reference to Breckland Council accepting a document as a ' <i>material consideration</i> ' does not provide any additional status nor should imply that it agrees with its content; it is simply another document to take account of.	Clarity.	Amend all references to this to confirm that this ' <i>acceptance</i> ' does not mean ' <i>support</i> ' or remove this ' <i>acceptance</i> ' statement e.g. para T3A.2, T3A.3, T3C.1, T3D.1, T7A.2, & T7B.3.
Although ' <i>accepted</i> ' and ' <i>supported</i> ' have different meanings, ' <i>accepted</i> ' has been amended to ' <i>acknowledged</i> ' where used in this context				

7*	General - references	When referring to another document, it would be useful to or clarify where the document can be found and have a website link.	Clarity.	It would be useful to indicate where the assessment on p10, ii, is found e.g. In the Basic Conditions Statement on the website, likewise on p33, T2A.4, where ' <i>STNP Justification of a Minimum Housing Target for the Neighbourhood Plan</i> ' can be found.
<p>Reference in 2.6 ii has been amended accordingly.</p> <p>With regard to the second part of the comment, it is surprising that the Council has been has not identified where '<i>STNP Justification of a Minimum Housing Target for the Neighbourhood Plan</i>' may be found, since it was submitted for consultation as one of the 19 documents that support the Plan, and was/is available for download on the same webpage as the plan itself. Additionally, the Council was provided with a full list of all such supporting documents, and a link to the relevant website page was provided in a letter that formally informed the Council of the pre-submission. Additionally comment 37 itself refers to the document, so at least one officer of the Council must have found it. Nevertheless, the reference has been prefaced by 'evidence base document' to make its whereabouts crystal clear</p>				
8*	General - maps	Format - Although generally well presented, the maps would benefit from being consistent with the information they contain e.g. some have a title, legend, north rose and scale, some have some of these elements and others have none. Also the font size used varies throughout and sometimes the information is still too small to read and therefore difficult to use e.g. p29, 30, 50-54, 118 & 133.	Presentation consistency and clarity.	<p>Review the map format to standardise for the Reg.16 version, to ensure all the basic information is provided advised.</p> <p>Where text is too small to read either make the map bigger, edit the map or remove and add text as a footnote.</p>
<p>With regard to maps Evidence Maps 1a and 1b, when an identical comment was made to the second Reg. 14 pre-submission, it was explained that the text in question is part of the background OS map and hence cannot be made larger or removed. In response to that earlier comment the following note was added to each map "map text note is part of the background, regarding copyright". Given that, it is unnecessary to read that OS text in full. No further change made</p> <p>Policy Maps 2F.1 -9 Maps enlarged and given a standard format as far as possible (the native map already has a north rose). Unnecessary map text deleted by cutting the images</p> <p>Evidence Map 5.3: Note added to explain the small-scale map key</p> <p>Evidence Map 7A: North rose added. Footnote note added to explain text too small to read on the map</p>				

9*	General - maps and graphics	Format - Most of the Maps look, to varying amounts, either like part of the right hand side is missing or, as well the graphics, need repositioning.	Presentation consistency.	Place all such maps and graphics in the centre of the page.
<p><b>Comment not agreed.</b> No part of any map is missing. Not all maps fill the full width of the frame in which they are presented, as each image is sized to best fit the relevant page. Hence in some cases by default there is blank space to the right of an image. Were the image to be enlarged to fit the width of the page, the full map would stretch over two pages, which is clearly unacceptable. It is surprising the reviewer has failed to check and understand that all necessary information is presented on the maps before making this spurious comment. No changes made</p>				
10	General - Format	Format - As previously advised, to be consistent, where there are criteria in the policy, replace the full stops with a right hand side bracket as this varies throughout the Plan.	Presentation.	As advised e.g. 2B,2C, 2E, 4 (top half), 7B, 7D(top half).
<p>The format of all lists standardised throughout – but note that Microsoft Word does not allow bracketed bullet points when the format i, ii, iii... is used</p>				
11	General - proofing	The Plan would benefit from having a detailed proof reading by another member of the working group to resolve any outstanding errors in the wording and presentation issues, as we may not have picked up all of them e.g. p10, iv. - There is more than one proposal in the Plan.	Presentation.	<i>“...in connection with the proposals in the Plan...”</i>
<p>The Council should not be making comments based on assumption. The reviewer incorrectly assumes only one person reads the Plan before it is submitted. Also, while it is agreed there are some errors, many of those noted in other comments as errors are in fact just reviewer preferences, or reviewer errors – for example, the “error” noted on page 10, does not exist: the wording there is actually <i>“... in connection with the proposal for the Plan...”</i></p> <p>Notwithstanding the above, in response to Health Check recommendation 3.51, the entire Plan has been proof-read and sense-checked after the incorporation of all relevant consultation and health check comments</p>				
		<b>TABLE OF CONTENTS</b>		

12	p1	The format of these pages have been improved and work better than the previous (2 <sup>nd</sup> ) Reg.14 version.		
Noted. No action required				
13*		The charts have been missed off this list.	Consistency.	Add: Chart 2E1: Age Demographics; Chart 2E2: Dwelling Size Demographics; Chart 2E3: Dwelling Type Demographics; Chart 2E4: Housing Tenure Demographics; Chart 2E5: No of Persons per Household; & Chart 2F: Site Selection Process.
This was a deliberate omission, but charts (and tables) have been added to the list of figures				
		<b>1. FORWARD</b>		
14*	p8, Note 3	The February and June 2019 versions of the NPPF are identical, except for the 'Correction slip' at the back of the document.	Accuracy.	<i>"Note 3: All references in this Plan to the National Planning Policy Framework relate to the version published in February 2019 and take account of the June 2019 update to that version".</i>
Amended as suggested				
15	p8 Footnote 1	The number is a minimum requirement of the Local Plan, where para 65 of the NPPF simply requires a figure. Policy HOU 04 allows for development that does not result in a significant over delivery above the 5% figure. Therefore the 5% is a minimum and not a maximum target and this needs re wording.	Accuracy.	<i>"Breckland Council planning policy officers have confirmed through emails that a figure of 33 is the <b>minimum</b> housing requirement figure (as per <del>paragraph 65 in the National Planning Policy Framework</del>) for the <del>Saham Toney Neighbourhood Plan during the plan period</del> Policy HOU 04 of the adopted Breckland Local Plan 2019".</i>
Amended as suggested				

		<b>3. THE NEIGHBOURHOOD AREA: SAHAM TONEY PARISH</b>		
16*	p11	2 <sup>nd</sup> sentence - This section also notes issues that that come about as a result of the public consultation.	Clarity.	<i>"It also notes issues that arise from the location and character of the parish, as well as the public consultation carried out".</i>
Agreed, but qualified to explain that initial, informal consultations were undertaken with parishioners, businesses and organisations				
17*	p 13,Figure 8	No of Households- it is not clear why two figures have been provided?	Clarity.	Make it clear the reason for the two sets of figures.
Explanatory note added				
18*	p14, para 3.5	This para concerning the priorities identified through early public consultation would fit much better at the end of the next chapter on Consultation, along with section 3.7.	Presentation.	Move to chapter 4.
Not agreed. This is simply reviewer preference. 3.5 contributes to describing the neighbourhood area, the topic of section 3. 3.7 deals with 'items identified through the Neighbourhood Plan work' as its title makes clear, rather than consultation feedback. Section 4 is intended as a very high-level overview of consultation activities, and it refers readers to the Consultation Statement, which should be read for full details				
19	p14, para 3.6.1	The list is out of date and the order is not clear - see May 2020-version of the LDS.	Accuracy.	See link to document above*. .
Updated to match the documents listed in the May 2020 LDS (with status noted therein to be that at March 2020)				
20*	p15, para 3.6.5	"lacks key services and facilities" is negatively phrased.	Para 16 b) "...be prepared positively..." NPPF.	Making reference to 'limited' key services and facilities would be more constructive.
Not agreed. It is not considered that NPPF paragraph 16b should reasonably be applied in the suggested way to descriptive statements of fact that do not form part of policy. Services and facilities that do not exist cannot factually be described as 'limited'				
21	p16-19	This section does work better with the graphics breaking up the previous 3 pages of plan text.		

Noted. No action required				
22*	p16, para 3.7.1	1 <sup>st</sup> sentence - No justification has been provided for this statement, which has used a recognised methodology and has also been through and found sound at an examination. If this this statement was accurate the Local Plan would not have been found sound.	Accuracy.	Object to the current wording. Replace with: <i>““The <del>simplistic</del> approach taken in the Local Plan does not <del>robustly or reliably</del> establish a sustainable level of growth for the Neighbourhood Area stop the parish seeking additional dwellings above that in the Local Plan”.</i>
Text amended, but in a different way to that suggested as it was felt complete rewording was necessary				
23*	p17, Table 3.7.2	Format - The use of the word ‘dwellings’ does not appear consistent with the presentation of just numbers in the rest of the table.	Consistency.	Remove the word ‘dwellings’.
Amended as suggested				
24	p18 - 19	Format - A space is missing from a couple of the para reference numbers.	Typo.	‘Issue 3.7.8.1’ and ‘Issue 3.7.9.1’.
Corrected				
25	p19, para 3.7.10	Typo - the underlining is missing.	Consistency.	<u>Issue 3.7.10.1:</u>
Corrected				
		<b>5. VISION STATEMENT AND OBJECTIVES</b>		
26*	p23, para 5.3	b. - This is a subjective statement.	Phrasing.	<i>“Set an <del>appropriate</del> <b>additional</b> level of development via site allocations (Policy 2A);”.</i>
Amended, but more accurately rephrased: <i>“Satisfy the Local Plan minimum growth target and set an additional level of development via site allocations”</i>				



27*		c. It would be more logical to move c. to after e. so it is consistency with the order of the policies in the Plan, otherwise this would suggest the order of the policies in the Plan is incorrect.	Consistency.	As advised.
Amended as suggested but noted this is another example of reviewer preference, since there is no prescribed order for policies in a plan				
28*		g. The use of the word ' <i>limited</i> ' has negative connotations and is unnecessary.	Need to be phrased positively Para 16 b) NPPF.	Remove ' <i>limited</i> '.
Reluctantly removed, as it is a factual statement- the Local Plan barely addresses this topic, and as noted in comment 20, NPPF paragraph is not considered to apply to such statements outside policy text				
29*	p23, Footnote 2	This is not consistent (an aspiration) with the approach taken in the rest of the Plan as 'phasing' is included in Policy 2A & all the site allocation policies. In view of comments on Policy 2A on this, remove 2 <sup>nd</sup> sentence.	Ability to enforce.	Remove as advised.
<p><b>Not agreed</b>, since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation, in response to health check recommendations</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
		<b>POLICY 1: SERVICES, FACILITIES &amp; INFRASTRUCTURE</b>		
30*	p25, Policy 1, P1.1	This should be just for major developments (developments over 10), as otherwise it risks making smaller schemes unviable.	Viability.	<i>"P1.1 For <b>all major</b> development proposals to be supported, it must be demonstrated that...."</i>
<p><b>Not agreed</b>. The paragraph has already been amended in accordance with recommendation 3.10 of the Health Check, July 2020, which did not require the limitation to major developments, but instead specifies 'where applicable'. It is considered the health check review more correctly addresses the issue and reflects an examiner's likely view, so that has been given precedence</p>				

Also, it is noted that the definition of major development stated in the comment in the context of housing, complies with neither the NPPF nor the Local Plan, which both give (a) 10 or more dwellings; (b) site in excess of 0.5 ha

31*		<p>Whilst it is agreed that there should be sufficient social infrastructure capacity to meet the needs of new development, it is possible that a proposal may make additional infrastructure available to meet the needs of that development if it is not already available.</p> <p>Certain infrastructure (education, community facilities, healthcare, shops, businesses and leisure opportunities may not be available in close proximity to new development but where possible these should be accessible through sustainable forms of transport.</p>	Clarity.	<p><i>“For development proposals to be supported, it must be demonstrated that there is sufficient social infrastructure capacity (including education, community facilities, healthcare, public transport, shops, businesses, employment, leisure and open space) available to support and meet all the necessary requirements arising from the proposal, or that any deficiencies required to meet the needs of a proposed development can be provided , local open space, as well as available sustainable transport (including public transport and or walking / cycling routes) to education, community facilities, healthcare, shops, businesses, employment and leisure opportunities).</i></p>
<p>Not agreed.</p> <p>(a) The paragraph has already been amended in accordance with recommendation 3.10 of the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner’s likely view, so that has been given precedence</p> <p>(b) Supporting text para. T1.3 already addresses the point made in the comment</p>				
32*	p25, Policy 1, P1.4	<p>This is unnecessary strategic policy which could apply anywhere and the Local Plan already addresses this issue in more detail. The Plan does not appear to set out the social infrastructure deficiencies that need to be addressed to meet the needs of the individual allocations. Without this it is unclear as to how the phasing of these relatively small scale</p>	INF 02 Local Plan (2019).	Remove.

		developments can be phased in this way. Also see comments re Policy 2A and 'phasing'.		
<p><b>Not agreed.</b> The criterion is specific to the limited infrastructure in Saham Toney and so is not strategic policy. The paragraph has already been amended in to address recommendation 3.10 of the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner's likely view, so that has been given precedence. As a result of the health check recommendation supporting text has already been added to set out deficiencies to be addressed and that will assist decision makers and others when they consider phasing of development. Additional justification for phasing and flexibility in its implementation have been provided elsewhere in the Plan in response to Health Check recommendations</p> <p>Local Plan Policy INF02 includes a range of caveats that will hinder the provision of additional infrastructure in small rural villages such as Saham Toney, so it is appropriate for the Neighbourhood Plan to address this at the local level</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p>				
33	p25, T1.3	See comments re Policy 2A and 'phasing'.	Ability to enforce.	Remove.
<p><b>Not agreed,</b> since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
34	p28, T1.17	See comments re Policy 2A and 'phasing'.	Ability to enforce.	Remove.
<p><b>Not agreed,</b> since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
35*	p29, Evidence Map 1a	Format - It would be better if the colour for the bus stops was a more contrasting colour to be easier to view.	Presentation.	Show in a contrasting colour e.g. purple.

<p><b>Not agreed.</b> This is simply reviewer preference. Additionally, it is entirely logical that both bus stops and the area within 800m of them should be an identical colour as they are one and the same issue. It is nonsense to suggest that small rectangles representing the bus stops themselves might be confused with the large arcs that define the 800m radius for bus stops</p>				
36	p31, Evidence Map 1c	Format - Include the same OS copyright info on Map 1a & b on Map 1c to be consistent.	Presentation.	As previously advised.
<p>Updated as suggested. Note the fact that the reviewer recognises the presence of the copyright note further negates comment 8 in respect of the map text</p>				
		<b>POLICY 2A: RESIDENTIAL HOUSING ALLOCATION</b>		
37	p32, Policy 2A	In the document mentioned in the last sentence of para T2A.4 (see Justification), both the title and in para 3.3a, address the issue of having a ' <i>minimum target</i> ', but this is not reflected in the text or in the policy,	<i>'STNP Justification of a Minimum Housing Target for the Neighbourhood Plan'.</i>	<i>"P2A.1 This Plan provides for <b>at least</b> 70 new homes..."</i>
<p><b>Not agreed.</b> The document referred to in the comment is the evidence base 'STNP Justification of a Minimum Housing Target for the Neighbourhood Area'. That document examines the Local Plan minimum target of 33, and concludes that it should be increased to 48.</p> <p>Site allocations alone deliver 70 new dwellings, and other unquantified growth is supported by Policy 2B and the exceptions given in Policy 2C.</p> <p>The site allocations have been established by an extremely robust process of assessment and selection, as evidenced by the Site Assessment and Site Selection reports, and furthermore it was agreed in a meeting with Breckland Council's Neighbourhood Planning Coordinator on 15 October 2019 that the extensive site assessment and selection work, and the fact STNP allocates more than twice the amount housing than required by the Local Plan, justify limiting the total allocation, and that greater flexibility of allocation numbers is more appropriate to a Local rather than Neighbourhood Plan</p> <p>Local Plan evidence concludes 33 is the appropriate number and Neighbourhood Plan evidence increases that to 48. It would be completely illogical and unjustified to further raise the minimum housing target to 70.</p>				

38	p32, Policy 2A, P2A.1	<p>Concerns remain over the use of <i>'indicative delivery'</i> (phasing), and we object to its inclusion.</p> <p>While para 73 states that <i>"all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites"</i>, in practice phasing normally occurs in relation to strategic sites and as it is not normally possible to refuse development that is acceptable in planning terms on phasing grounds alone. This would be exacerbated if the five year housing supply in Breckland were to worsen over the next few years. It is not considered <i>'appropriate'</i> for the Para 73, NPPF to apply to the Plan.</p>	<p><i>"...arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances...."</i> (e.g. a substantial proposal or when not formally part of the development plan). Para 49, NPPF.</p>	<p>Amend to just set out the housing allocations in the Plan i.e. remove phasing from the policy. This could however be listed as a Parish preference in the support text for individual sites.</p> <p>Also in all other policy, remove references to the 'phasing' element including; P2H.2; P2I.2; P2J.2; P2K.2; P2L.2; P2M.3; P2N.2; P2O.4; P2P.2. As well as text including: T2A.3; T2H.17; T2I.10; T2J.17; T2K.19; T2L.10; T2M.7; T2N.7; T2O.11; T2P.14).</p>
<p><b>Not agreed.</b> (a) It is not accepted that whatever is done 'in practice' overrules the NPPF; (b) Phasing has already been further addressed in response to the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner's likely view, so that has been given precedence. As a result, additional justification for phasing has been provided and flexibility in applying this aspect of Policy 2A has been introduced; (c) The indicative phasing set out in Policy 2A, if applied, will deliver 57.5% of the Local Plan's minimum housing target in the first 5 years of the Plan period. (d) Phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement); (e) Local Plan allocation policies themselves mention phasing of development</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
39*	p32, T2A.1	<p>1<sup>st</sup> sentence - this does not reflect the current situation as the Plan allocates more housing than has been identified in the Local Plan.</p>	Clarity.	<p><i>"Policy 2A of the Neighbourhood Plan provides a parish specific context to <del>broader growth requirements</del> allocate additional housing</i></p>

				<i>than that</i> indicated in the Local Plan (se para T2D.1) “.
Not agreed: The Local Plan does not identify housing for Saham Toney, rather it establishes a minimum housing requirement. No change made				
40	p32, T2A.1	3 <sup>rd</sup> sentence - this requires either deleting the text in brackets (as it duplicates the text in T2A.2) or to reword to be accurate; HOU 04 quotes a %, where Appendix 5 provides a figure.	Accuracy.	Either remove as advised or amend “To be consistent with ... the Local Plan (which requires the overall numbers <b>of dwellings</b> in Saham Toney not to significantly <del>exceed</del> <b>increase by more than 5%; Appendix 5 clarifies that this would be a 33) ...”.</b>
Unnecessary to implement. The sentence in question has already been deleted and replaced with alternate text in response to Health Check recommendation 3.11				
41	p32, T2A.1	4 <sup>th</sup> sentence - If the Plan allows for more homes under Policy 2B & 2C, this suggests that there could be more housing than the 70 units already allocated. It will not be possible to ‘ <i>manage within the number allocated in this Plan</i> ’, as more than this number have already been allowed for”.  See comments on Policy 2A ‘minimum target’ above.	‘STNP Justification of a Minimum Housing Target for the Neighbourhood Plan’.	“(see Policy 2C)., <del>but otherwise the level of new residential development permitted will be managed within the number allocated in this Plan.</del> ”
<p>Not agreed. The comment misinterprets the text in question. The Plan delivers the following new housing:</p> <ul style="list-style-type: none"> <li>• 70 houses via allocated sites;</li> <li>• An unquantified number that may come forward in accordance with Policy 2B;</li> <li>• An unquantified number that may come forward via the exceptions in Policy 2C (P2C.1 (a) and (b))</li> </ul> <p>So yes, clearly as the comment reflects, there may indeed be more than 70 new dwellings in total, but the text in question requires housing on the allocated sites to be managed within the total of 70. That is made clear by the word ‘otherwise’, which means other than new development coming forward via Policy 2B or Policy 2C exceptions. Notwithstanding that this is considered to be abundantly clear, a clarification note has been added to the existing text, which itself remains unchanged</p>				

42	p32/3, T2A.2	Parts of the 6 <sup>th</sup> and 8 <sup>th</sup> sentence concerning ' <i>paragraph 3.10 clarifies the 7% growth</i> ' duplicate one another and is unnecessary.	Duplication.	Remove from either sentence.
6 <sup>th</sup> sentence deleted accordingly				
43	p33, T2A.4	This section does not address the issue whether all of these sites are deliverable or developable. (See comments on Policies 2H, 2J & 2K).	Deliverability.	Amend to add text  As well as being sustainable and suitable, it is important for the Plan to include statements for all the allocations that demonstrate landowner / developer support and confirming that each is viable and deliverable or developable when assessed against the infrastructure / masterplanning requirements for each one.
Letters confirming the availability, deliverability and viability of has all 9 allocated sites have been received from the site owners. Appropriate statements are included in supporting text to each allocated site policy/ It is not a requirement that the letters themselves be included in the Plan				
44	p33, T2A.4 b)	It is not possible to ' <i>futureproof</i> ' against any increase in housing units as it's the Local Plan that establishes the strategic housing allocation. Future housing requirements Breckland are yet to be determined as are any implications this number may have on the development strategy for the District. The additional houses proposed in the Neighbourhood Plan (37) are additional to the current Local Plan figures. Although the numbers are likely to increase due to the Local Plan Review, due to the new national housing methodology requirements, the Neighbourhood Plan needs to conform to the current adopted Plan and not the emerging one.	Accuracy.	Remove b).
Not agreed. This recognises that any number of factors, including Local Plan review, changes to the planning system etc., may result in a higher housing target. The text does not claim to know what such increase might be, nor to guarantee it will be less than the 37 dwellings delivered by the site allocations				

in addition then present Local Plan target. But regardless, it cannot be disputed that 37 additional houses provides a very good margin for possible future growth in the target (i.e. 112%) and so the Plan to some extent is 'future-proofed'. To reflect lack of certainty in this respect in the text 'serves' has been amended to 'may serve'				
		<b>POLICY 2B: RESIDENTIAL DEVELOPMENT WITHIN THE SETTLEMENT BOUNDARY</b>		
45*	p36, Policy 2B, P2B.1 a)	This is not using the same wording used in Policy 7A.	Terminology.	Replace ' <i>medium</i> ' with ' <i>moderate</i> '.
Amended as suggested				
46*		Also why does this apply only to ' <i>landscape sensitivity</i> ' when Policy 7A also addresses ' <i>visual sensitivity</i> '?	Clarity.	As advised.
Amended as suggested				
47*		Format - It would be clearer if this referred to a Map (e.g. an amended 7A.3 or new map), rather than a Policy to understand where is applies.	Clarity.	As advised.
Not agreed. This is reviewer preference. The policy and its references are clear and not subject to interpretation. It refers to Policy 7A which includes a table (by fringe area) of landscape, visual and combined sensitivities, and shows the fringe area on Policy Map 7A.3. It would complicate that map to duplicate the sensitivity information on it. Additionally, as the Parish Landscape Character Assessment explains, the settlement fringe areas blend into the open countryside and do not have distinct, specific boundaries where they do so				
		<b>POLICY 2C: RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY</b>		
48*	p39, T2C.8	See comments on Policy 2A re ' <i>minimum target</i> ', as this policy does not address substituted sites as an option.	Ability to enforce.	Remove last sentence.
Not agreed. See responses to comments 37 and 41. Additionally, Policy 2C very clearly addresses substituted sites – see P2C.2. It is unnecessary for that option to be duplicated in Policy 2A				



		<b>POLICY 2D: AFFORDABLE HOUSING</b>		
49	p39, Policy 2D, P2D.1	Reference to site STNP1 appears to be missing as it meets the criteria and is mentioned in P2H.3.	Clarity.	Add reference to 'STNP1'.
<p><b>Not agreed.</b> This comment overlooks the Council's earlier comments in response to the second pre-submission consultation, 2019 and subsequent advice it provided with regard to affordable housing, which made clear that local connection criteria may only be applied to developments that are additional to those required to meet the Local Plan housing target (33). T2D.1 makes clear that sites STNP1, 2, 9, 13, 14 and 15 are jointly expected to deliver the minimum requirement. They cannot therefore be subject to the local connection criteria, which as P2D.1 specifies, is applicable only to sites STNP4, 7 and 16</p>				
50	p39, P2D.1	<p>The Local lettings policy hierarchy needs to accurately follow the latest Breckland Housing Allocations Policy</p> <p>b) should be former resident of Parish for 3 out of last FIVE years,</p> <p>c) should be close family connections who currently lives in Parish and has done so for past 3 years (Close family connection is defined as a person who is a parent, spouse, civil partner, child or sibling of the applicant or someone who has a relationship with the applicant that can be construed as a close family connection even though not related by blood),</p> <p>d) should be needs to live in Parish due to permanent employment (not time limited to 3 years).</p>	<p>To be consistent with Housing Act 1988 (as amended) and priority for those in reasonable preference groups Also as outlined in Breckland Council's amended housing allocations policy, para 3.4</p> <p><i>Connection to the local area criteria</i> (April 2020).</p>	Amend hierarchy as advised.
<p>Principle agreed, although this comment is inaccurate. With regard to local lettings, the latest Housing Allocations Policy, as adopted in March 2020, states that preference will be given to those meeting the criteria stated in a planning agreement.</p> <p>The hierarchy suggested appears to have been adapted from the local connection criteria given in paragraph 3.4 of the Allocations Policy, but omits the highest tier of that.</p>				

Hence the hierarchy in Policy 2D has been amended as suggested, but adapted to better match the local connection criteria hierarchy noted in the Allocations Policy. Implementation text has been added to give the Housing Allocations Policy definition of close family connection				
51	p39 P2D.1	The local lettings criteria should be time limited to avoid lengthy voids that has occurred since the local letting element of this policy has been introduced, as normally bids need to be made within a week of being advertise. If no local lettings applicant is found within 2 weeks then the Breckland Allocations Policy applies.	To ensure that houses are let as soon as possible.	<i>"Where no-one with a local connection .... the pool of eligible applicants has been exhausted, <b>within two weeks</b>, prioritisation of other candidates will be in accordance with Breckland Council's housing allocations policy".</i>
Amended as suggested (noted that the comment actually applies to P2D.2, rather than P2D.1)				
52	p40, P2D.3	We support this approach regarding not allowing artificially sub-dividing a plot to negate the requirement to provide affordable housing.		
Noted. No action required				
53	p40, T2D.3	1 <sup>st</sup> sentence - This approach is not consistent with national guidance. Also as this is not consistent with the Breckland Council Housing Allocations Policy nor Local Plan Policy, we object to this approach.	See Local Plan Policy HOU 07, which is a Strategic Planning Policy.	Amend to apply to all affordable housing or remove as it does not conform to the relevant strategic Local Plan policy.
Agreed and deleted. We are pleased to extend the applicability of the local lettings criterion				
54	p40, T2D.7	It is not clear why STNP1 is listed as a smaller site  allocation when it is the 3 <sup>rd</sup> largest allocation and largest site.	Clarity.	<i><del>"The smaller sites allocations (sites STNP1, STNP2, STNP9, STNP13, STNP14 and STNP15),</del> are sufficient to realise the Local Plan target."</i>
Amended as suggested				
55	p41, T2D.8-11	Format - Line spaces between all these paragraphs are missing.	Presentation.	As advised.

Corrected accordingly				
		<b>POLICY 2E: HOUSING MIX</b>		
56*	p42, Policy 2E, P2E.1-3	There is no need to mention “ <i>Saham Toney Housing Needs Assessment, 3rd Edition, April 2020</i> ”, in each paragraph. This could be resolved by removing it from para’s P2E.1-3 and adding to para P2E.5.	Phrasing Duplication.	Removing reference to research as advised, but add it to the start of para P2E.5: “ <b><i>Local housing needs should meet that identified in the Saham Toney Housing Needs Assessment, 3rd Edition, April 2020</i></b> ”.
Agreed in principle, but it is not appropriate to add the reference to P2E.5 which covers housing standards by reference to Local Plan Policy HOU 10, a topic not dealt with by the Housing Needs Assessment. Instead the reference text in P2E.1-3 has been replaced by a footnote that provides reference to that Assessment				
57*	p42, Policy 2E, P2E.3	See comments re p54, P2G.1 re clarifying major development.	Clarity.	“P2E.3 For sites that will deliver 10 or more dwellings ( <b><i>major sites</i></b> )....”,
Not agreed. This criterion deliberately avoids use of the term ‘major development’ since that also includes sites over 0.5 hectares in area, and it is not the intention that it should apply to a development of less than 10 dwellings, even if the site size exceeds 0.5 hectares. Hence the context is different to that for Policy 2G				
58	p42, P2E.4 b)	The terminology needs amending. Low-cost home has a specific meaning within the NPPF, but it is a type of affordable housing that is strongly discouraged in Breckland as it does not meet local need.	Clarity.	Replace ‘low cost ownership’ with ‘affordable home ownership’ which is a broader term.
Change not accepted as suggested, but implemented in an alternate manner. Policy 2E concerns housing mix for all new residential development, not just affordable housing. The term ‘low-cost home’ is not in fact defined in the NPPF. STNP makes a clear distinction between affordable housing in its formal meaning, and ‘housing that is genuinely affordable’, and for the latter uses the term low cost ownership. However, to avoid potential confusion, ‘low cost ownership homes’ has been replaced by ‘homes at a cost...’				
59*	p42, P2E.4 c)	Reference to “ <i>social and affordable housing</i> ” is incorrect in planning terms, as the term ‘social’ is no longer a type of housing.	Terminology – see NPPF Glossary on Affordable Housing.	Remove reference to ‘social and’.
Amended as suggested				

60*		Also to consider the inclusion of delivering community led housing as part of the housing mix, which is a type of self- build scheme.	See <a href="https://easterncommunityhomes.com/">https://easterncommunityhomes.com/</a>	As advised.
Considered but not agreed. The policy deals principally with house sizes, not development models, and affordable housing is covered in Policy 2D. No action taken				
61	p42, Policy 2E,P2E.4 c)	Affordable housing includes affordable and social rented housing and intermediate housing (shared ownership and shared equity). However, the description mentions just ' <i>social and affordable housing</i> ' which is misleading as there is only ' <i>social and affordable rent</i> '.	Clarity – see NPPF Glossary on Affordable Housing.	Affordable housing includes affordable rented housing and intermediate housing (shared ownership and shared equity).
See response to comment 59. By removing 'social and' the criterion now simply refers to affordable housing. STNP glossary refers to the NPPF for a definition of affordable housing. No additional change to that noted to comment 59				
62*	p44, Chart 2E4: Housing Tenure Demographics	Government has two types of rent category- Social Rent and Affordable Rent. In Breckland this is only likely to apply to the latter so needs to be amended.	Clarity.	As advised.
Amended as suggested				
		<b>POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES</b>		
63*	p47, Policy 2F, P2E.1	Replace ' <i>proposal</i> ' with ' <i>allocation</i> ', the latter is much more specific as demonstrated by its use in the title of this policy - see comments re General - Terminology.	Terminology.	"All residential development <del>proposals shall</del> <b>allocations should...</b> ".
Not agreed. As part of the clarifications recommended by the Health Check, the Policy title has been amended to cover all new residential development since the Plan permits non-allocated housing. Hence the comment is no longer relevant or applicable (noted that the comment applies to P2F.1 not P2E.1)				
64	p46, T2E.8	Format - 2 <sup>nd</sup> line – the return halfway along the page needs removing.	Presentation	As advised.
Corrected as advised				

65*	p47, Policy 2F, P2E.2	As policy concerning 'Landscape and Visual Appraisal' has been amended to take a proportionate approach, it would be appropriate to take the same approach to all sites on this issue.	Viability.	"P2F.2 A <del>full</del> <b>proportionate</b> ecological appraisal shall be provided...".
Principle agreed, but a change has already been implemented in response to a Health Check recommendation (change 'full' to satisfactory). Additionally, the noted criterion has no connection with Landscape and Visual Appraisals, which do not apply to all sites (see Policy 7A), but concerns ecological appraisals. Finally, it is noted that this comment applies to P2F.2 rather than P2E.2. No action required				
66	p50-54, Policy Maps 2F.1-9	Format - It would aid clarity if the access information on these maps were included on the site map for each site.	Presentation.	As advised.
Not agreed. This is simply a reviewer preference. The presentation of Policy Maps 2F.1-9 has been improved in accordance with comment 8. The site maps included in each of the site allocation policies 2H-2P are intended to show only the extent and boundary of each site. Furthermore, they are not at an appropriate scale to include such details, and it is not appropriate to increase their scale simply to duplicate information given elsewhere (also duplication often leads to discrepancies of data)				
		<b>POLICY 2G: MASTERPLANNING</b>		
67	p54, Policy 2G, P2G.1	The wording does not flow well and is not clear why sites STNP1, STNP4, STNP7 and STNP16 appear to be excluded from being (further) masterplanned, although the approach appears to be different in the individual site allocation policies (2H, 2J, 2K & 2P). For these sites, this policy appears to require that they should be similar to the research and layouts included in the Plan, however this too restrictive and does not offer the flexibility required by the planning system.	11. a) plans should .... be sufficiently flexible to adapt to rapid change..." NPPF and to be consistent with Plan policy 2H, 2J, 2K & 2P.	Remove from " ; with the exception of proposals for allocated sites STNP1, STNP4, STNP7 and STNP16 ..." until the end of the sentence.
Not agreed. This has nothing to do with 'future change'. Sites STNP1, 4, 7 and 16 have been professionally masterplanned to establish indicative layouts that acceptably meet all relevant STNP policy criteria. Policy 2G clearly states that those sites will not need to be masterplanned again <u>if</u> the site layouts proposed for them do not differ significantly from their indicative masterplans. To delete that caveat would impose unnecessary costs on a developer and hence be subject to challenge. At the same time the policy requires that if a layout for any of those 4 sites is put forward that differs significantly from their respective				

masterplans, a new masterplan must be submitted to support them. Hence a developer may present any layout he/she wishes, but it must be shown by a new masterplan that it complies with all relevant STNP policies				
Instead of amending the policy text as suggested, new implementation text has been added to further explain the above				
68	p54, P2G.1	It would be clearer if was a policy that identified what was considered to be 'major'.	Clarity.	See amendment to p41, P2E.3a this is the first time in the Plan that 10 units is mentioned, otherwise clarify in this policy.
This has already been addressed in response to a Health Check recommendation. Supporting text has been added to explain that 'major development' shall be as defined in the latest version of the NPPF. No further action required				
69	p54, P2G.1	See comments re General - Terminology.	Terminology.	"...with the exception of <del>proposals for</del> <b>the allocated sites...</b> ".
<b>Not agreed.</b> The term is not used with regard to the allocated sites, but applies to any non-allocated sites that may come forward should those constitute major development. Hence the term 'proposals' is completely appropriate				
70	p54, P2G.1 & 2	It would be clearer if the was policy identified what was meant by 'acceptable'.	Clarity	<del>P2G.2 "...that shall be to a</del> <b>those produced to similar level of detail to that shown on Policy Maps 2G.1 and 2G., will be considered as acceptable".2</b>
Amended as suggested				
71*	p54, P2G.3	It is not clear why the terminology used here is different to that in Policy 7A.	Clarity.	Replace 'medium' with 'moderate' and remove 'combined' before 'high'.
Partly implemented as suggested. 'medium' replaced with 'moderate'. But there is no use of the word 'combined' before 'high' so the comment is incorrect in that respect. The correct terminology, compatible with Policy 7A is used – i.e. moderate-high, or high combined sensitivity				
72	p54, P2G.3	It would be useful if there was a cross reference to a map (e.g. an amended Map 7A.3 or new map) that identifies 'landscape sensitivity'.  N.B. The map on p133 only refers to 'moderate high' and 'high sensitivity' & Policy 7A does not clarify this either.	Clarity.	Include a map where this is clearly demonstrated.

<p><b>Not agreed.</b> See the response to comment 47 for reasons.</p> <p>Regarding Evidence Map 7A on page 133, as noted in T7A.10, it is taken from a Breckland Council document and STNP is unable and unwilling to amend text taken from other sources. STNP has no way in which to equate its own use of 'moderate', 'moderate-high' and 'high', with the Council's use of similar terminology. That map is presented only as further evidence of the large areas of Saham Toney parish that have landscape character that is sensitive to development. Given that the Council's LCA was produced in 2007, clearly the parish specific LCA of 2019 is more relevant and takes precedence</p>				
73	p55-59, Figures 17, Policy Map 2G.1 & 2	While we welcome the inclusion of these plans, it should be made clear that they are for illustrative purposes only – see comments re P2G.1 above.	Clarity.	As advised.
<p><b>Not agreed.</b> See also response to comment 67, although contrary to this comment, no earlier comment has been made about the Policy maps being only illustrative. That is not accepted. Their purpose is clearly explained in Policy 2G, the clarifications added to it, and the responses to other comments on Policy 2G. the Policy includes no requirement for the masterplans in the policy maps to be exactly replicated, or for site layouts to exactly mimic them.</p> <p>P2G.3 has been clarified to explain the intended use of Figure 17</p>				
74	p56-59, Policy Maps & Legends, 2G.1 & 2	N.B. The printed maps and legends are presented the opposite way around to those on pages 88 and 158-165 and the online version.	Presentation.	
<p>The online pdf version of STNP is the master. The printed version was provided as a courtesy to assist the Council's review. Since the Council officer who requested it insisted it was urgently needed, printing was done in a rush and these mistakes happened at the printers. The printer is aware. No action required</p>				
		<b>SITE ALLOCATION POLICIES – GENERAL COMMENTS</b>		
75	All site allocation policies (2H- 2P)	As previously advised, concern remains over the reference to phasing in all these policies - see comments re Policy 2A re phasing.	Ability to enforce.	Remove as advised.
<p><b>Not agreed.</b> See responses to comments 29, 32, 33, 34 and 38</p>				

76	All site allocation policies (2H- 2P)	As previously advised, the use of the words 'up to' (previously 'a maximum of ') remains too prescriptive. Both these issues can be dealt with through amendments to the policy, as well as phrasing it more positively. Also see comments on Policy 2A on 'minimum target'.	Phrasing.	".....for <del>up to</del> <b>at least</b> x new dwellings ..... will be permitted subject to meeting the following criteria:".
<p><b>Not agreed.</b> See responses to comments 37 and 41. It is pointed out again that in making this comment the Council has unilaterally retracted the agreement made between STNP and the Council's Neighbourhood Planning Coordinator on 15 October 2019, when similar comments on the previous Reg. 14 pre-submission were discussed. It is common practice where a party wishes to vary an agreement, that it first gains the approval of the other party to do that, and it is unfortunate the Council has chosen to ignore such protocol</p>				
77	Policies 2H, 2J 2K & 2P	The same approach regarding the positive wording can be taken regarding those sites delivering affordable housing.	Phrasing.	"This site is required to deliver <del>a minimum of</del> <b>not fewer than at least</b> x affordable homes".
Amended as suggested				
78	Policies 2H, 2J & 2K.	In the 2 <sup>nd</sup> Reg.14 version of the Plan, the supporting text stated that these policies were not " <i>yet be considered deliverable</i> " and no reference to whether they were developable. In this version of the Plan, all the other site allocation policies (I, L, M, N, O & P) state in the text that they are " <i>considered deliverable</i> ". However, the text is silent on whether these three sites are deliverable or developable, therefore this needs to be clarified?	Para 67 requires sites to be either deliverable or developable (NPPF).	<p>Either clarify their status or remove them if they are not deliverable or developable.</p> <p>See comments for p33, T2A.4 above</p>
A letter confirming the availability, deliverability and viability of site STNP1 (Policy 2H) has been received from the site owners				
		<b>POLICY 2H: SITE ALLOCATION STNP1: GRANGE FARM, CHEQUERS LANE</b>		
79	p60, Policy 2H, T2H.2	As previously advised, e) - g) are not separate issues, but still don't seem to have been combined as has occurred in POLICY 2L?	Addresses similar issues- see draft Consultation Statement.	As advised.



This comment actually applies to P2H.1 g). That has been amended to read the same as P2L.1 f) with regard to merging requirements for FRA's and the location of development (i.e. oversight of previous agreement corrected).

P2H.1 i) relates to a separate topic: the requirement for attenuation of flood risk to be outside areas at medium or high risk, rather than development (covered by point (g)), hence no change is made in this respect

		<b>POLICY 2I SITE ALLOCATION STNP2: DISUSED PIGGERY, OFF HILLS ROAD</b>		
80	p64, Policy 2I, P2I.2	Previously there was a requirement for affordable housing on this site due to the size of the site. It's not clear why this has been reduced from 0.5 ha, by almost half to 0.30a, when the size of site map has not changed? Although the draft Consultation Statement explains that this figure takes account of the land for housing (2,709 sqm) and access (315 sqm), does this figure include other site uses e.g. Is the figure the total site size or just for these two elements?	Clarity & para P2D.3, Policy 2D Affordable Housing.	Further clarity is required.

A Council comment in response to the second Reg. 14 pre-submission of 2019 required that an exact measurement of site STNP2 should be made (to confirm if an affordable housing requirement should apply). The site owner carried out a full measurement, with verification by a STNP work group member and that confirmed the reduced area. In hindsight it appears the site owner simply over-estimated the area when putting the site forward in response to the call for sites. The measurements given in the Consultation Statement are for the whole site, as shown on Policy Map 2I.

No action required

		<b>POLICY 2K: SITE ALLOCATION STNP7: PAGE'S FARM</b>		
81*	p70, Policy 2K	As previously advised, f) - h) are not separate issues, but still don't seemed to have been combined as has occurred in POLICY 2L?	Addresses similar issues - see draft Consultation Statement.	As advised.

P2K.1 f) already addressed the merging comment from the previous Reg 14 consultation and matches the wording of P2.1 f), so no further change is required in this respect

P2K.1 h) relates to a separate topic: the requirement for attenuation of flood risk to be outside areas at medium or high risk, rather than development (covered by point (f)), hence no change is made in this respect				
		<b>POLICY 2M: SITE ALLOCATION STNP13: HILL FARM</b>		
82	p77, Policy 7C, P2M.3	Format - Add space after '3'.	Typo.	"P2M.3 2 This site....".
Corrected as advised				
		<b>POLICY 2O: SITE ALLOCATION STNP15: 8 RICHMOND ROAD</b>		
83*	p81, Policy 20, P2O.2	Why is a policy required to demolish the existing property?	Clarity.	Clarify as advised.
This is a new comment to a requirement that has not changed since the second Reg. 14 pre-submission, August 2019, to which the Council made no comment. That notwithstanding the Health Check highlighted a lack of clarity regarding the plan for the existing dwelling. As a result of that P2O.1 has been amended to state that the six dwellings to be delivered are to replace the existing dwelling. That being the case, P2O.2 has been deleted				
84	p83 Map	This map duplicates some of the information from the map on page 53. It would aid clarity if all of the information for a site was included on a single map.	Duplication & clarity.	Include all the information from the maps on pages 53 & 83 on the map on page 84.
Not agreed. Policy Map 2F.8 shows that safe access to site STNP15 is achievable by demonstrating that the necessary visibility splays can be provided, but without specifically dimensioning the location of the access point. It would be inappropriate to precisely define the access point location on a policy map, as that may restrict a developer. The map referred to in the supporting text to Policy 2O is evidence to address an earlier concern raised by the Local Highways Authority as to the distance of an access point from the bend in Richmond Road to the east. That annotated map confirms the maximum distance available between the bend and a potential access point. Furthermore, the scale of Policy Map 2F.8 and the map given in T2O.11 is significantly larger than that of Policy Map 2O, and the latter serves an entirely different purpose (as similarly noted in response to comment 66)				
		<b>POLICY 2P: SITE ALLOCATION STNP16: RICHMOND HALL</b>		

85	p84/5, Policy 2P, P2P.1 e)	It is inappropriate to link to a site which already has planning permission in this way. However, a different wording would be possible.	Phrasing.	<i>"The site <del>will be developed in conjunction with</del> <b>should have regard to</b> the immediately adjacent site which has outline permission (Ref. 3PL/2018/0563/));".</i>
<p><b>Not agreed.</b> The allocated site cannot reasonably 'have regard' to the site with outline planning permission, since the proposed site layout for the latter will not provide access to the former. The owner is using the adjacent site as insurance against the allocated site being removed, but has made clear he has no intention to either develop the 5-house site or sell the land for others to do so. Once the Plan is made he intends to submit a new combined application for the combined site in line with Policy Map 2G.2.</p> <p>This is explained in updated policy and supporting text</p>				
86*	p85, P2P.3	Format - amend 'four' to the relevant number to be consistent with the other site allocation policies. Also in light of the above box comments, remove the end of this policy, unless the site is in the same ownership. Also see comments on Policies 2H, 2J 2K & 2P re positive wording.	Consistency & Phrasing.	<i>Either "...to deliver not fewer than four <b>at least 3</b> affordable homes in combination with the adjacent permitted site" or at least.</i>  <i>Or "...to deliver not fewer than <b>at least 4</b> affordable homes" in combination with the adjacent permitted site <b>has it has the same ownership</b>".</i>
Amended as suggested				
87	p87, T2P.13	Amend text in light of comments made in relation to Policy 2P.	Phrasing.	<i>Amend in view of the amendments to P2P.3: "Since it <del>will be set and developed in conjunction with</del> <b>should have regard to</b> the adjacent permitted site (which has outline approval for 5 dwellings) the two sites should be considered jointly with regard to affordable housing, leading to the requirement for <del>no less</del></i>

				<del>than 4 at least [3 [4] affordable homes</del> , as it is in the same ownership].”
<p><b>Not agreed.</b> The allocated site cannot reasonably ‘have regard’ to the site with outline planning permission, since the proposed site layout for the latter will not provide access to the former. The owner is using the adjacent site as insurance against the allocated site being removed, but has made clear he has no intention to either develop the 5-house site or sell the land for others to do so. Once the Plan is made he intends to submit a new combined application for the combined site in line with Policy Map 2G.2.</p> <p>This is explained in updated policy and supporting text</p>				
		<b>POLICY 3A: DESIGN</b>		
88	p89, P3A.3	It would be useful to cross refer to para T3A.11, which has a summary of the ‘village character vernacular’.	Clarity.	<i>“Local vernacular: Design proposals shall .... incorporate Saham Toney’s character vernacular (see p94), whilst...”.</i>
<p><b>Not agreed.</b> This is reviewer preference, not essential to policy implementation. The supporting text to which cross reference is suggested is itself just a summary of local vernacular, and refers to the Parish Design Guide for full details. Policy 3A already refers to the Design Guide. Also, it is unusual for policy to directly cross-refer supporting text.</p>				
89	p90/1, 3A.9 a)	This section has a number of sustainable design solutions including BREAM. Which/whose established principles are being referring to?	Clarity.	Reference the principles being referred to.
<p>The criterion has already been rewritten in response to a Health Check comment on a similar theme, thus: “Where practical, use renewable and recyclable resources and reduce waste in both construction and operation”. No further action required</p>				
90	p91, 3A:9 k) & l)	These criteria include a number of low energy requirements, but guidance is needed on how a developer demonstrates this or a planner assessed this? There is reference in part in the supporting text in para T3A.5(T section).	Clarity.	<i>Amend P3A.1 “Planning applications will be expected to be accompanied by a statement (see T3A.5) which explains how the design principles...”</i>
<p>Requirements concerning climate change issues have been moved to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A. The revised version already addresses the points made in the comment</p>				

91	p91, 3A:9 I) ii)	This is a high requirement for this type of development in this location. We would question whether this is realistically achievable?	Clarity.	Some evidence into the viability of this policy for non-residential development in Saham Toney is required.
<p>As part of moving requirements concerning climate change issues to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A, the requirement in question has already been deleted. Hence no further action required.</p> <p>It is however noted that as a principle the 'in this location' aspect of the comment is objected to. There is nothing in national or local policy or guidance that in any way downgrades the need to act on climate change issues in a small rural village</p>				
92	p91, P3A.9 I ii)	Remove ' <i>and additionally</i> ' this is not required as this section applies to different types of development.	Terminology.	Remove as advised.
<p>As part of moving requirements concerning climate change issues to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A, the requirement / text in question has already been deleted. Hence no further action required.</p>				
93*	pP91, P3A.10 f)	The terminology ' <i>social housing</i> ' is no longer used in planning terms.	Terminology	Replace ' <i>social</i> ' with ' <i>affordable</i> '.
Amended as suggested				
94*	p92, T3A.3	Design Guide - This does not clarify how consultation with the public, specifically the local community, has occurred for the Design Guide? Who were consulted? When? What was their response? And how was their response addressed?	Clarity.	As advised.
<p>Not agreed that this information is required in STNP. Information about consultations is appropriately included in the STNP Consultation Statement. This is a reviewer request for background information rather than something that is required to implement policy. The Design Guide has been formally consulted on as part of two Reg. 14 pre-submissions of STNP – one that ran from August to October 2019 and the other from June till August 2020. In terms of the local community, all those who live, work or carry out a business in the Parish were informed of the consultation and the document was available on the STNP website. Outside of formal consultations, the Design Guide has been made available on the STNP website when first published in March 2019, and then updated in May 2020, and villagers have been informed of that both by information in the village newsletter and at parish council meetings.</p>				
95	p92-98, T3A Supporting Text	These statements are to support and provide additional information for the Policy. However, there is no logical order to them and it appears to be a catch all section. There needs to be a rationale for this section.	Clarity.	To edit this section as advised.

**Not fully agreed.** The rationale is precisely as stated in the comment: to support and provide additional information for the policy. Additionally, to provide guidance on to assist with policy implementation. It is not a 'catch all' section.

To assist understanding some paragraphs of supporting text have been reordered, and sub-headings matching the relevant ones in policy text have been introduced to the supporting text

96	p92-98, T3A.5 g)	In the design guide the wording refers to reinforcing the vernacular, however this wording leans towards mimicking the vernacular style, which could lead to pastiche development.	Clarity.	Edit text to be consistent with design guide.
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Amended accordingly

97	p93, T3A.6	1 <sup>st</sup> sentence - As design is subjective, it is not appropriate to include such a negative statement or opinion about late 20 <sup>th</sup> design without any evidence for it, for which there is none. Therefore this needs amending.	Phrasing.	<i>"It is not the intention of Policy 3A that design simply mimics that of the area immediately surrounding a site, since in many cases that may result in <b>copying poor</b> the propagation of late 20<sup>th</sup> century design that <del>overwrote and detracted</del> from the village vernacular. Instead Policy 3A seeks to guide greater use and reinforcement of the <b>better quality</b> village vernacular".</i>
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Amended as suggested. However, it is pointed out that the evidence for the original text is given in the Saham Toney Parish Landscape Character Assessment, January 2020, which was prepared by a professional landscape architect, and includes the text that is objected to in this comment.

98	p93/4, T3A.11	The 'tick box' list duplicates some of the contents of Appendix A and is therefore unnecessary.	Duplication.	Remove this information, but refer to the relevant section in Appendix A: <i>"The village character vernacular is summarised below, but reference <del>must</del> should be made to the in Guiding Principle 2: Identity-Attractive and Distinctive Design in Appendix A ..."</i>
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Reference to Appendix A has already been deleted in response to a Health Check comment (since the information in policy supporting text is the same as the vernacular information in guiding principle 2 or Appendix A). Hence change implemented as follows: “The parish character vernacular is summarised below. Full details are given in the Saham Toney Parish Design Guide”				
99		This ‘tick box’ refers to the desired requirements in materials and built form; not a summary of the ‘ <i>village character vernacular</i> ’.	Clarity.	Outlines the village character as descriptions rather than prescriptive instructions.
Added text ‘Description of features to reinforce...’				
100*	p94, T3A.12	4 <sup>th</sup> sentence – Could be more diplomatic by reordering some of the text and removing parts.	Phrasing.	<i>“sSite designers should visit the area to examine its character and feel before “putting pen to paper”, rather than using off-the shelf designs used regularly in other places outside the Neighbourhood Area should not be used and,”.</i>
Amended as suggested				
101*	p96, Map	Format - There is no explanatory information included on this map e.g. title, legend, north rose or scale.	Presentation.	Provide as advised.
An amended map with scale and north rose has been substituted for the original. Since this is simply an information map, format as policy or evidence maps is not required. Sufficient explanatory information is already given in the supporting text that immediately precedes the map				
102	p98, T3A.26- 29	Format - The text on this page has been justified on the right hand side, where the majority of the Plan has not.	Presentation consistency.	As advised.
Amended to be justified on the left-hand side				
		<b>POLICY 3B: DENSITY OF RESIDENTIAL DEVELOPMENTS</b>		

103	p99, Policy 3B	<p>There remains concern that the current approach is not the most effective use of land and not in accordance with NPPF (Ch11), as it is possible to design at higher densities and still fit with character of area.</p> <p>Also the 2<sup>nd</sup> sentence is repeating the 1<sup>st</sup>, but in more detail - the previous version was generally better.</p>	NPPF, para 122 refers to making an 'efficient' use of land & there are three other criteria not mentioned in the Plan's supporting text that need to be considered e.g. different housing types & land availability; market conditions & viability; and design.	<p><i>"P3B.1 The density of new residential developments <del>shall</del> <b>should</b> maintain the prevailing character and setting of Saham Toney <del>and. To be supported, residential development proposals must shall be guided by the data on existing densities as provided for the 19 areas listed in Table 3B.1 below.</del>"</i></p>
<p><b>Not agreed, as previously advised.</b> The Council has unilaterally retracted the agreement made with its Neighbourhood Planning Coordinator at a meeting on 15 October 2019 that density requirements are justified by NPPF para. 73, by the rigorous process of site allocations and site selection used, and by the landscape character, flood risk and infrastructure limitations of the neighbourhood area. The reviewer appears to consider Saham Toney as an urban area, which it is not.</p> <p>This topic has already been addressed in response to Health Check comments and additional supporting evidence has been provided for both the individual densities of allocated sites, and the general requirements in Policy 3B</p> <p>See also action taken in response to comment 4.</p> <p>Different housing types are covered in Policy 2E: Housing Mix</p> <p>Design is covered in Policy 3A: Design</p> <p>Land availability is addressed by STNP's site allocations</p> <p>The market will decide market conditions, STNP cannot do so</p> <p>Viability is a developer issue, but the landowners of all allocated sites consider those sites to be viable. There is no evidence to suggest that the guidelines given in Policy 3B will hinder viability.</p>				
104	p100, T3B.4	1 <sup>st</sup> sentence - this is written as if it were a policy, rather than text, (which should justify or explain policy). This is not necessary as it is stating the purpose of the policy.	NPPG makes reference for plans to be flexible (para 11 & 81 b).	Remove.



Not fully agreed. First sentence is agreed to be policy text and has been removed. The remaining text provides implementation guidance for the policy and is appropriate to remain				
		<b>POLICY 3C: SITE ACCESS AND ON-SITE STREETS</b>		
105	p103, Policy 3C, P3C.1, c) & e)	These could conflict with one another as some traffic calming measures involve the creation of spaces without separate roads and pavements e.g. Home Zones. This is an intention of this policy?	Clarity	Clarify as advised.
STNP had not previously considered Home Zones, but has now done so. Having done so, there is no desire to actively promote their use in new on-site streets, but neither is there a wish to prevent their implementation. It is considered that the existing text of P3C.1 c) would allow that, without conflict with P3C.1 e), since the latter includes the wording 'where appropriate'. No action required				
106	p103, T3C.3	Format - the letter's' is missing from the word 'site'.	Grammar.	'Sites'
Amended as suggested				
107*	p103/4, T3C.5	3 <sup>rd</sup> sentence - This requirement for a condition is not specific enough. It is also for Breckland Council to determine what conditions are required for each individual applications.	Requirements for Conditions.	Remove.
Not fully agreed. Rather than being removed, text has been amended as follows: "Where considered appropriate by the Local Planning Authority, a condition may be imposed..."				
108*	p104, T3C.6	2 <sup>nd</sup> & 3 <sup>rd</sup> sentences re conditions. It is Breckland Council's responsibility to determine planning applications, and therefore what conditions are required for each individual application.	Requirements for Conditions.	Remove.
Not fully agreed. Rather than being removed, text has been amended as follows: "...sub-standard, and where considered appropriate by the Local Planning Authority, a condition requiring its improvement prior to the commencement of the development may be imposed"				
109	p104, TC3.10	Format - letter and number need to be swapped to have the same referencing format as the rest of the Plan.	Consistency.	Swap 'C' & '3' e.g. T <b>3</b> C.10.
Corrected				

		<b>POLICY 3D: PARKING</b>		
110*	p105, Policy 3D, P3D.1	g) It would be useful to refer to the relevant part of the Local Plan, as in j).	Clarity.	<i>"...and the parking standards defined in the Local Plan in <b>Appendix 2</b>;"</i>
This has already been amended in response to a similar comment in the Health Check. No further action required				
111	p106, T3D.1	It is incorrect to state that as the Parish Council adopted the Design Guide it "...is therefore a material consideration". Any piece of research is a 'material consideration', whether adopted by the Parish Council or not.	Accuracy	<i>"...was formally adopted by the Parish Council on 01 June 2020, and is therefore a material consideration in planning decisions."</i>
Not fully agreed, since adoption by the Parish Council = acceptance by the village = greater weight. Word. 'therefore' only removed				
112*	p106, T3D.3	2 <sup>nd</sup> sentence – this ignores the fact that the Local Plan already sets standards, as identified in P3D.1 g) and therefore this sentence does not apply.	See Local Plan policy HOU 06 & TR 02	Remove.
Second sentence deleted and reference to Local Plan policies HOU 06 and TR 02 added				
		<b>POLICY 3E: DARK SKIES PRESERVATION</b>		
113*	p107, Policy 3E, T3E.2 b) & c)	As previously advised, it is not appropriate to include lighting times which is an operational matter that the county has responsibility for.	Enforceability.	Remove criteria.
Not agreed (as advised in response to the previous consultation). See Consultation Statement, Appendix B3. Text in T3E.2.b) & c) does not refer to lighting-up times but relates to specific times of day/night throughout the year, regardless of dusk/dawn times. For the avoidance of doubt, a clarifying note to that effect has been added				
114	p108, T3E.6	Format - further amendments are required as a result of editing.	Typo.	<i>"T3E.6 Policy criteria (ed) and (fe) are derived from Planning Practice Guidance on light pollution".</i>
Corrected as advised				

115*	p108, Map	There is no explanatory information included on this map e.g. title, legend, north rose or scale.	Clarity.	Provide as advised.
The Council has not commented on this at two previous consultations, and it has not changed, so for it to do so now is surprising, as well as pedantic, since the map is self-explanatory, and reference is also given to its website source for those wishing to know more. Nevertheless, the map has been updated to show a scale bar (part of the original website image) and a north rose. It is not possible to create a legend, and although it is obvious that bright areas are those lit at night, a note to that effect has been added to the accompanying supporting text				
		<b>POLICY 4: NON-RESIDENTIAL DEVELOPMENT</b>		
116*	p109, Policy 4, P4.1 c)	Not all such developments will have any of these negative impacts.	Accuracy.	<i>"...or any noise, effluent or fumes it <del>would</del> <b>may</b> emit;"</i>
Amended as suggested				
117*	p109, Policy 4, P4.2	Reference should be made to the Local Plan Policy on Developer Contributions (planning obligations) rather than the regulations to provide a better understanding of what is being sought.  N.B Reference to the CIL regulations could cause confusion as there is no CIL in place in Breckland.	Clarity.	<i>"...facilities, in accordance with the requirements of <del>regulation 122 of the Community Infrastructure Levy Regulations 2010</del> <b>Policy INF 02 Developer Contributions</b>".</i>
Amended as suggested. Note: this paragraph had already been moved to supporting text in response to a Health Check recommendation				
118	p109, P4.4 c)	Such developments are already permitted under ' <i>permitted development</i> ' and would be considered as ' <i>ancillary</i> ' to the use of residential development, so is not needed.	Accuracy.	Remove.
Deleted as suggested				

119	p109, Policy 4, P4.4 d)	The text in brackets also appears in para T4.8 and is more appropriately located there.	Duplication.	<i>"Enabling micro-businesses (i.e. those that employ fewer than 10 people have a turnover no more than £632,000 [ONS, HMRC &amp; Companies Houses definition])"</i>
Deleted as suggested				
		<b>POLICY 5: SAHAM TONEY RURAL GAP</b>		
120*	p112, Policy 5, T5.7	It was be useful to cross refer this paragraph to the map on p133, to demonstrate the point being made.	Clarity.	As advised.
Note this is another new Council comment on material that has not changed since the previous consultation, but implemented as suggested				
121*	p115, Photographs	Format - It would be more consistent if these photos were presented in a uniform size and filled the whole box.	Presentation.	As advised.
Note this is another new Council comment on material that has not changed since the previous consultation, and is personal preference of the reviewer. However, adjustment has been made as far as is practical				
122*	p120, Policy Map 5.1	The Map insert is too small to be easily read and is not necessary.	Presentation clarity.	Remove.
Not agreed. Note this is another new Council comment on material that has not changed since the previous consultation, and reviewer preference. The insert does not need to be read; it simply shows where the Rural Gap is in the context of the whole neighbourhood area. It therefore serves a useful purpose and will not be deleted. Likewise, the insert does not detract from the clarity of the main map				
123	p111- 116 Omission	The text should explain what is required by 'A Landscape Visual Impact Appraisal' or should this read 'Landscape and Visual Appraisal'? If the former, it also needs defining in the Glossary.	Clarity.	As advised.
Amended to 'Landscape and Visual Appraisal' which is already defined in the glossary				
124	p116, T5.17	The map references need amending.	Typo	<i>"...as shown on Evidence Maps 5.12 and 5.23".</i>
Amended as advised				
		<b>POLICY 6: HERITAGE ASSETS</b>		

125	p121, Policy 6, P 6.5	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for conditions, para 54-56 NPPF.	"P6.5 Where a need for field evaluation is identified by Breckland Council, a planning condition <del>shall</del> <b>may</b> be agreed to prevent any disturbance..."
Amended as suggested				
126	p128, Policy Map 6D	N.B. The printed map appears the opposite way around to those on pages 88 and 158-165 and the online version.	Presentation.	
The online pdf version of STNP is the master. The printed version was provided as a courtesy to assist the Council's review. Since the Council officer who requested it insisted it was urgently needed, printing was done in a rush and these mistakes happened at the printers. The printer is aware. No action required				
		<b>POLICY 7A: LANDSCAPE CHARACTER PRESERVATION AND ENHANCEMENT</b>		
127*	p129, P7A.3	Does 'visual sensitivity' only apply to 'Settlement Fringe Areas', if so the Glossary needs amending. If not, add refer to it ('and visual') after 2 <sup>nd</sup> landscape.	Clarity.	As advised.
The term 'landscape sensitivity' is used by professionals to indicate both landscape (character) and visual sensitivity. However, since the Council clearly does not understand this the requested clarifying text has been added to P7A.3 and other applicable paragraphs. Again, noted that this is a new comment on text that has not changed since the previous formal consultation				
128*	p129, P7A.5 c)	See comments about title for Table P7A.1: Settlement Fringe Landscape Sensitivities by area.	Clarity.	As advised.
The paragraph in question has already been deleted as a result of a Health Check comment. No further action required				
129*	p130, Table P7A.1	It is not clear why the title only makes reference to 'landscape sensitivity', when the table also refers to 'visual sensitivity'.	Consistency.	"Table P7A.1: Settlement fringe landscape <b>and visual</b> sensitivities by area:".
Title amended to include both visual and combined sensitivities				
130	p132, T7A.10	Format – Remove the 'E'.	Typo.	"... Evidence Map E7A.".
Amended as advised				

131*	p134-6, Policy Maps, 7A.1-3	Format - It would be consistent if the colour on the map was also used in the legend.	Consistency.	As advised.
Not agreed. This is entirely reviewer preference and the maps are not in any way inconsistent. It is also not possible to achieve. The map is reproduced from the Landscape Character Assessment and uses colours generated in software used by STNP's landscape consultant that cannot readily be reproduced in Microsoft Word. Even were it possible, adding colours to the legend would add nothing to understanding of the maps				
132*	p136, Policy Map 7A.3	Format - The map would benefit from having a explanation about the shaded grey areas (VCA1-8), as found on Map 7A.3.	Presentation	As advised.
Not agreed. The noted areas are already described in the map notes: "Character area boundary extended to include settled areas excluded from the Local Plan settlement boundary". Although areas denoted 'VCA' are defined elsewhere, a note to explain those are village character areas has been added for the benefit of those who fail to understand				
133*	p136, Policy Map 7A.3	Format - This map should either be amended to either list sensitivity types on the map or a produce new one to show clearly where the 3 local landscape sensitivity types (Moderate; Moderate-High; & High) are.	Clarity.	As advised.
Not agreed. This comment duplicates comment 47 – see the response to that				
		<b>POLICY 7B: KEY VIEWS</b>		
134*	p138-147, Photographs and Maps	Format - It would be more consistent if the titles for the Photographs and Maps were underneath these images, rather than over to be consistent with the rest of the Plan.	Consistency.	As advised.
Not agreed. This is reviewer preference only. What the reviewer perceives as photo titles are actually supporting text paragraph titles, and so, <u>for consistency</u> , rightly belong above the photos. That being the case, map titles in this case have been placed above the maps, to avoid any potential confusion with the paragraph titles. None of this detracts from understanding of the Plan				
135*	p139-147, Maps	It would also look better if all these maps were more uniform size, particularly the smaller ones on pages p1346, Maps 7A.1-3 being made larger.	Presentation.	As advised.
Maps presented to a more standard size, but noted this leads to an increase in white space in the text. Any future comments with regard to plan length in respect to this will not be accepted				

136*	p148, Policy Map 7B	Format - Aside from using a consistent font size in the legend, the colour used for these two difference types of key is too similar to easily read. Also it would help if the landmark features (red stars) were named on the map.	Clarity.	As advised.
Partly agreed. Legend font size standardised. The map is taken from the Parish Landscape Character Assessment and was produced with software not available to STNP and therefore the symbol colours are not possible to revise. Also, in the view of STNP the white and beige circles representing the two types of view are very readily clear and distinguishable and don't requirement amendment				
		<b>POLICY 7C: LOCAL GREEN SPACES</b>		
137	p148, Policy 7C, P7C.1	Format - Add space after '&'.	Typo.	"...and & C 2..."
This was a typo. '&' should have been '7', and has been corrected accordingly				
138	T7C.3 & 4	As these duplicate one another, merge and remove duplicated text.	Duplication.	As advised.
T7C.4 deleted accordingly				
139*	p150, T7C.5	The majority of the characteristics identified by the Open Spaces Society are already identified in the Plan PF as examples of being ' <i>Demonstrably special to the community</i> ', therefore the criteria 'Beauty to 'Richness of wildlife' should sit under this section. It would also make more sense of why there is a mixture of 'Yes' and '✓ & ✕'. The exception to this is ' <i>Supported by the Parish Council</i> '. This is an unnecessarily as not only is it not a NPPF requirement, if it the sites aren't supported by the Pariah Council they shouldn't be included in the Plan.	Clarity.	As advised.
Generally, not agreed as commented. The first three criteria in Table T7C are taken from the NPPF. The remainder are taken from the Open Spaces Society in its Information Sheet No. 20 - Local Green Space Designation (both types are described in the supporting text above the table). The latter recommends				

including 'support by the parish council' as justification for a local green space, so that guidance has been followed. While agreeing that a lack of parish council support might negate designation, confirmation of such support in all cases does not detract from clarity, but in fact makes the position clearer. 'Yes' has been replaced by '✓' for the first 3 criteria and headers have been added to the table to make clear the sources of the two types of criteria				
140*	p151, Policy Map 7C.1	Format - The Map insert is too small to be easily read and is not necessary.	Clarity.	Remove.
Not agreed. Note this is another new Council comment on material that has not changed since the previous consultation, and reviewer preference. The insert does not need to be read; it simply shows where the policy map area is in the context of the whole neighbourhood area. It therefore serves a useful purpose and will not be deleted. Likewise, the insert does not detract from the clarity of the main map				
141*	p152, Policy Map 7C.2	Format - It would be more consistent if these photos were presented in a uniform size and were in boxes, as on p115, but filled in the whole box	Presentation.	As advised.
This is simply reviewer preference, but the request to place the photos in boxes has been accommodated. The images were sized to suit the size of the green space concerned and as can be seen some are landscape, some are portrait and some are square as a result. The amount of work required to reproduce them all to a standard size from scratch is not warranted, since as presented they do not detract from understanding of the Plan in any way. Also, were they to be a standard size the Policy Map would only fit on a single page by making each image smaller than the present ones, thereby reducing clarity				
		<b>POLICY 7D: BIODIVERSITY AND HABITATS</b>		
142	p154, T7D.1-7	The order of these paragraphs could be better arranged by setting the context before addressing the detail.	Clarity.	At the start of the 'Implementation' section, put T7D.5- 7, followed by T7D.1-4.
Amended as suggested				
143	p154, T7D.3	Level 2 - Notable Trees have no recognised status in town planning, so should be removed.	Terminology.	"....Level 2: Priority habitats: ....; <del>notable trees</del> ;
Deleted accordingly. Also applies to the notes to Policy Maps 7D.1a and 1b (note: there are only 2 notable trees in the neighbourhood area)				



144	P154, T7D.8	1 <sup>st</sup> sentence re P7D.3 - this won't <i>'apply equally to all other locations'</i> , as this will vary according the hierarchy in T7D.3.	Clarity.	As advised.
First sentence of T7D.8 deleted				
145	p154/5, T7D.8	6 <sup>th</sup> sentence re conditions. It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	Remove.
Rather than deleting the requirement, it has been amended (in a similar manner to that suggested in comment 125) to: "may be ensured by planning conditions, if deemed necessary by the Local Planning Authority."				
146	p155, T7D.10	Which species are being referred to? Also see T7D.8.	Clarity.	Either refer to 'T7D.17' or to 'Policy Map 7D.4a and b'.
Rewritten thus: "Additionally species shown on Policy Maps 7D.4a and b are designated as of local priority by this Plan and shall be considered in accordance with P7D.3"				
147	p159, Maps 7D.1a-7D.4b	Maps 7D.2a-7D.3b have the same relevant Legend whether it appears on the map or not, but Maps 7D.1a-b and 7D.4a-b have different legends, mainly showing what applies (except 7D.1b having 'Ancient Woodland' when none is on that map). It would be better to have a consistent approach to the Legends.	Presentation consistency	As advised.
Legends amended accordingly where applicable				
		<b>POLICY 7F: TREES AND HEDGES</b>		
148*	p168, P7F.1	While sympathetic to this approach, this can only apply where they are <i>'irreplaceable'</i> such as <i>'ancient woodland'</i> and <i>'ancient or veteran trees'</i> .	Para 175 c), NPPF.	As advised.

**Not agreed.** Paragraph 175 c) of the NPPF states “such as ancient woodland and ancient or veteran trees”. I.e. those are examples, not the only types offered protection. Additionally, protection as required by the policy is supported by NPPF paragraphs 175 a) and d)

Note: This is a new comment on a policy criterion that has not changed since the previous formal consultation. The recent examiner’s Health Check raised no concern about this paragraph

149*	p169, P7F.4	3rd sentence re conditions. This requirement for a condition is not specific enough. It is Breckland Council’s responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	<del>Where necessary, planning conditions should be sought to secure planting of new trees and hedges”.</del>
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Amended rather than deleted, in a similar manner to the responses to comments 125 and 145

150	p169, Policy 7F P7F.5	As previously, advised, the words ‘the roots’ should be removed to ensure that all parts of the tree are protected. Also ‘Appendix A’ should read ‘Annex A’.	Changes proposed as per the wording in the 5837 document.	“...measures shall be taken to protect <del>the roots of</del> all trees and hedges,... defined in sections 5-7 and <del>Appendix</del> <b>Annex A</b> of British Standard BS5837:2012...”
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Amended as suggested

151	p169, T7F.3	Policy DC 12 has been superseded by Local Plan Policy ENV09.	Accuracy.	“...and is in accordance with <del>Policy DC12 of the adopted Development Control Policies</del> <b>Local Plan Policy ENV09.</b> ”
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Amended as suggested

		<b>WATER MANAGEMENT POLICIES</b>		
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152	p170-189, Policy 8A-9	<p>There is concern that a number of these policies are not a land use planning matters, but are implementation (Building Control) ones.</p> <p>Also there is a risk that such technical information can quickly change and risks them becoming out of date. If reference to current guidance is retained then should be clarified to include the following (or prevalent guidance at the time of application):</p> <p>The policies need to be significantly reduced to cover the main planning issues e.g. Surface water, Sustainable drainage including SuDS and Sewerage. Also to separate out the '<i>what</i>' from the '<i>how</i>'; keeping the former in the policy and the latter into another guide or appendix.</p>	<p><i>"...<u>what</u> infrastructure should be provided..."</i></p> <p>para 1 PPG on Neighbourhood Planning.</p>	As advised.
<p>Paragraph 1 of PPG on Neighbourhood Planning has no relevance to the policies in question nor with regard to the comment to set out the 'what' but not the 'how'. These are policies describing the requirements for satisfactorily managing surface water, not the introduction of infrastructure</p> <p>It is noted that the Norfolk County Council Lead Local Flood Authority has formally confirmed it has no comments on the suite of drainage policies and has praised them in writing, and that a professional review of the policies found them to be robust. Anglian Water accepts the policies subject to a few minor revisions to cross-references it recommended and which have been incorporated</p> <p>The policies have been edited as a result of health check recommendations. No changes other than those already implemented as a result of health check comment 3.48 are considered necessary in response to this comment. As edited the policies do not duplicate the requirements of building control. A comparison has made between the policies and Building Regulations Part H, most specifically section H3: Surface Water Drainage to confirm this</p> <p>As part of the response to the health check recommendations, a new supporting document, the Saham Toney SuDS Design Manual, has been prepared, and includes material edited out of the various policies. A new appendix setting out the guiding principles of that manual has been added to the Plan</p>				
		<b>POLICY 8A: SURFACE WATER MANAGEMENT GENERAL PROVISIONS</b>		

153*	p170, P8A.1	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	<i>"All development proposals shall include a site-specific Surface Water Drainage Strategy, <b>when required</b>. That Strategy, including any necessary flood risk mitigation measures, should be agreed <del>as a condition of the development</del>, before any work commences on the site, and implemented before the new development is connected to the existing drainage system. <del>Development will not be allowed to proceed until this condition has been discharged</del>"</i>
<p><b>Not agreed</b></p> <p>Text making clear when a Surface Water Drainage Strategy will be required has already been added in response to a health check recommendation and has more clarity than the comment's suggested "when required" which is open to interpretation and lacks sufficient precision. No further action required</p> <p>The requirement regarding conditions has already been deleted in response to a health check recommendation, hence no further aspect is required on that aspect of the comment.</p>				
154	p175, T8A.19	Format – This paragraph page has been justified on the right hand side, where most of the Plan has not been.	Presentation consistency.	As advised.
Amended to left-hand justification				
155*	p176, Photographs	Format - It would be more consistent if these photos were presented in a uniform size, except on the last row, but filled all the box.	Presentation.	As advised.
<p><b>Not agreed.</b> This is entirely reviewer preference and in no way detracts from understanding of the Plan. To stretch some photos to make them fit their box would result in the images not fitting the width of a page. To trim others to do likewise would result in smaller, and hence less clear images.</p>				
		<b>POLICY 8F: MANAGEMENT &amp; MAINTENANCE OF SUSTAINABLE DRAINAGE SYSTEMS</b>		

156	p184, T8F.2	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions or planning obligations are required for each individual application.	Requirements for Conditions and for Planning Obligations, para 54 & 57.	<del>T8F.2 it shall be ensured through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of a development</del>
Not fully agreed. This is too important an issue to simply delete the paragraph in question. Instead it has been reworded as follows: <i>"It may be appropriate for the Local Planning Authority to apply planning conditions or planning obligations to ensure that there are clear arrangements in place for ongoing maintenance over the lifetime of a development."</i>				
		<b>MONITORING</b>		
157*	p194, Table	In relation to Policy 2A target, remove monitoring indicator <i>'Delivery broadly in line with the planned trajectory'</i>	Ability to enforce.	As advised.
Not agreed. (a) Clearly this follows the Council's comments on phasing, but each of those has been rejected with justifying reasons; (b) a monitoring indicator does not require enforcement; (c) these are the indicators the Parish Council wishes to monitor its Plan with and it is not appropriate for Breckland Council to dictate what the indicators should be				
158*	p194, Table	In relation to Policy 2D target, remove reference to <i>'social and'</i> .	Terminology.	As advised.
Deleted as suggested				
159*	p194, Table	In relation to Policy 3A target <i>'Pattern and Design of New Housing'</i> , it is not clear what criteria and how this is measured.	Clarity.	Provide details on how the monitoring will be undertaken.
Not agreed. (a) sufficient information is given in the 'target' column; (b) It is not appropriate for Breckland Council to dictate or interfere with how the Parish Council chooses to monitor its own indicators; (c) clearly these will be somewhat subjective indicators				
160	p194, Table	In relation to Policy 3A target <i>'Use of Local Vernacular'</i> , it is the indicator how local vernacular is used or how a development responds to the local vernacular? The target is <i>'How well the design relates to the Parish</i>	Clarity.	Provide details on what is being measured and how.

		<i>Design Guide'</i> , but it is unclear how this is measured.		
Not agreed. (a) sufficient information is given in the 'target' column; (b) It is not appropriate for Breckland Council to dictate or interfere with how the Parish Council chooses to monitor its own indicators; (c) clearly these will be somewhat subjective indicators				
161	p194, Table	In relation to Policy 3A target ' <i>Building for Life Quality Indicators</i> ', while ' <i>Building for Life 12</i> ' does provide a method to measure good design, it does requires somebody who is trained in its use to use it. Who would assess buildings against the Building for Life 12?	Clarity.	Provide specifics on how the monitoring will be undertaken. N.B. Building for Life 12 has been updated to include active health.
This indicator should have been deleted as reference to 'Building for Life' was previously removed from Policy 3A. This indicator now deleted				
		<b>GLOSSARY</b>		
162	p198/99, Tables	While we welcome the introduction of the Glossary, it would be more useful to the reader if all the terms were found in the Plan.	Clarity.	As advised.
As a result of a word search, 5 unused terms have been deleted from the Plan specific glossary. It is not considered appropriate to edit the references to NPPF and Local Plan glossaries				
163*	p199	Basic conditions - It would be useful to clarify what they are.	Clarity.	Either refer to p10 of the Plan for the details or summarise as " <i>.... that a neighbourhood plan must meet. These include: having regard to national policy, contributing to attaining sustainable development, conforms to the strategic policies in development plan, compatible with EU (environmental) obligations, meets Conservation Regulations and meeting other legislation &amp; regulations</i> ".
Reference to paragraph 2.6 added				
164	p200, Omission	A definition for 'Ecological assessment', as the term is used in the plan.	Clarity.	As advised.

The term 'ecological assessment' occurred 18 times in the Plan, while 'ecological appraisal' was used only twice. For consistency those two occurrences and the glossary term have been changed to 'ecological assessment'				
165	p200	Health Check - Reference should be made to an ' <i>independent examine (or ex inspector)</i> ' rather than a ' <i>qualified inspector</i> '.	Terminology.	As advised.
Amended as suggested				
166	p201	Housing Register - Remove reference to ' <i>social and</i> '.	Terminology	As advised.
Amended as suggested				
167	p201	Local Green Space - "... <i>discretionary designation giving it protection from development in a similar manner to green belt land.</i> " is not accurate. The status of the two is  different; it is the way that it is managed that should be the same.	"101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts". NPPG & as referred to in para T7C.1 of the Plan.	"... <i>discretionary designation, which should be managed giving it protection from development in a similar manner to green belt land.</i> "
Amended as suggested				
168	p201	Local lettings - This should apply to affordable housing properties as the issue of rent is not a factor.	Terminology.	"A policy applying to affordable <del>properties rent tenure</del> ..."
Amended as suggested				
169	p202	Notable Tree - This definition has no recognised status in planning.	Terminology.	Remove from glossary.
Deleted as advised				
170	p202	Parish Action Points - "... <i>but which fall outside the permitted scope of</i>	Clarity.	"... <i>but which fall outside the permitted scope of neighbourhood planning, are not planning</i>

		<i>neighbourhood planning, and so are to be dealt with separately</i> ” is not accurate.		<b>policies</b> and so are to be dealt with separately”.
Amended as suggested				
171	p203	Scheduled Monument – The glossary should explain what this is rather than refer to legislation.		Replace with “ <i>Scheduled Monuments are archaeological sites or historic buildings that are nationally important. Not all ancient sites are always scheduled.</i> ”
Amended as suggested				
172	p203	Site allocation - the description could be made more succinct.	Clarity.	“ <i>The designation of a residential housing site as an allocated site in the Neighbourhood Plan following a process of site assessment and selection</i> ”.
Amended as suggested				
173	p203	Social housing - this term is no longer recognised as a type of housing in planning.	Terminology.	Remove from glossary.
Removed				
		<b>Appendix A</b>		
174	p205-07, Appendix A General	<p>The Appendix aims to be a summary of the key design principles drawn from the Design Guide to support the Design Policies in Plan. However, there are some guiding principles which are too general, vague or a repetition of statements made elsewhere in the Plan and others which are too specific.</p> <p>The idea of providing a summary of key points from the Design Guide and the Landscape Assessment in an Appendix to support the Design policy is a good one. However, as previously commented, the Design Guide requires further editing to</p>	Clarity.	<p>Review Design Guide to draw on the key design principles and key character points which support the Design policy.</p> <p>Separate items from the Guide which are supporting text for the policies and additional information which should be in the Appendix.</p>



		enable the key poignant points to be drawn out.		
<p>The appendix has been appropriately edited to address this comment and to distinguish the guiding principles from policy supporting text. Supporting text has also been edited to reflect comments 94 - 102</p> <p>It is respectively pointed out that the Parish Design Guide is a Parish Council document, to which Breckland Council cannot “require” changes, as it seeks to do in this comment. It may only recommended amendments. Breckland Council comments on the Design Guide made on two previous occasions during informal reviews have been implemented to the extent the Parish Council wishes to do so and considers appropriate. It is unclear how a design guide point can be poignant!</p>				
175	p205, Guiding Principle 2	<p><i>“Identity, Attractive and Distinctive Design (all)”</i></p> <p>It is not clear whether this section is meant to be a Design Guiding Principle or a description of the village vernacular. As design guiding principles, they tend to be prescriptive and denote rules e.g. in the use of “favoured option, alternate option” rather than guiding principles.</p> <p>It contradicts with the overarching proposed purpose of the design guide as indicated on page 5 of the Design guide:  <i>“1.3 This guide does not comprise a set of rigid formulae to be followed slavishly. In the specific context of a particular development, various guidelines may conflict and some will be more appropriate than others.” Also see p6 2.2 c) &amp; e).</i></p>	Clarity .	All development design should respond sensitively and positively to the Village Character Vernacular as described in the Design Guide. However, there are various conflicting views within the Plan which lean to mimicking the historic vernacular rather than responding to it sensitively. Consistency of policies, design principles and supporting text is required throughout.
Guiding Principle 2 completely rewritten				

176	p206, Guiding Principle 4	<p><i>"Built Form - Buildings that front onto street"</i> This needs to be developed to add more clarity. This statement could lend itself to favour ribbon development along the roads, but this would contradict the guiding principle of preventing coalescence of existing village clusters.</p> <p>This needs to be developed to add more clarity.</p>	Clarity	Depending on the reasoning and rationale for the principle, reword to make clearer what the guidance is and what should be achieved.
Guiding principle deleted as it is covered by the Design Guide				
177	p206, Guiding Principle 4	<i>"Built Form - integrated interfaces with the countryside"</i> It is not clear what is meant by this guiding principle. Is it for development to integrate seamlessly and sensitively with its rural setting?	Clarity.	As advised.
Reworded accordingly				
178	p206, Guiding Principle 4	<i>"Built Form - maintain dark skies"</i> Saham Toney is not a designated dark sky area	Clarity.	Rephrase to provide a design principle to reduce intrusive light at night.
Reworded accordingly				
179	p207, Guiding Principle 8	<i>"Design all tenure types to the same quality and appearance"</i> The statement is ambiguous in what is meant by the same appearance for all tenure types? This is to support Policy 3A 10F 'which is presented more clearly without this additional text.	Clarity .	Rephrase or remove.
Deleted				
180	p207, Guiding Principle 9	<i>"Homes and Buildings: Functional, Healthy and Sustainable - Follow National Design Guide Advice"</i>	Clarity.	Provide more detailed information.

		This is too vague and is not clear about which advice it is referring to?		
Rewritten				
181	p207, Guiding Principle 9	<i>"Incorporating convenience features .... will likely increase a property's saleability"</i> . This is a justification, not guidance.		Replace with <b><i>"Sustainable convenience features should be included at the design stage"</i></b> .
Rewritten as suggested				
182	p207, Guiding Principle 11	<i>"Lifespan- made to last Follow National Design Guide Advice"</i> This is too vague and is not clear about which advice it is referring to?	Too vague- which advice are you referring to in the NPPF?	Provide more information
Guiding principle 11 deleted				
183*		N.B The examiner would benefit from a sheet showing all the policy references changes between the four plans e.g. Reg.14 version 1 - 3 & Reg.16, to assist understand the differences between the different versions of the Plans		
Not agreed. The examiner will examine only the Reg. 16 submission version of the Plan, not all previous versions. The Plan is not the correct document for an explanation of the development of the Plan, derivation of policies etc. That is more properly given in the Consultation Statement, and STNP considers that already provides sufficient detail in this respect				

## APPENDIX C4. Pre-Submission Consultation June-August 2020: Statutory and Non-Statutory Consultee Comments and STNP Responses

### C4.1: Representation by Sport England

<b>CONSULTEE:</b> Sport England	<b>DATE:</b> 24 June 2020
<b>REPRESENTATION(S):</b> Thank you for consulting Sport England on the above neighbourhood plan.  <b>1)</b> Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b> , identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.  <b>2)</b> It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. <a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a>  <b>3)</b> Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a>  <b>4)</b> Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b> . A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.  <b>5)</b> Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a>	

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

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

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

8) In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

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

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

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

**Link c)** Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

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

Yours sincerely,

Planning Administration Team  
[Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)



**RELEVANT SECTION(S) OF PLAN:**

Policies 3A, 4 and 7C

**REACTION TO REPRESENTATION(S)**

This is an exact duplicate of the response made by Sport England to the second Regulation 14 consultation on the Neighbourhood Plan (August-October 2019). See Appendix B4.1

**ACTION TAKEN:**

None required  
See Appendix B4.1 for further details

## C4.2: Representation by Norfolk Police

<b>CONSULTEE:</b> Norfolk Police	<b>DATE:</b> 25 June 2020
<b>REPRESENTATION(S):</b> <p>Dear Chris,</p> <p>Thank you for the below invite on the Strategic Environmental Assessment. Although I may not offer comment on this particular section, I am anxious as one of the Designing Out Crime Officers for Norfolk Police to have some input on the Neighbourhood Plan with regards to secure environments.</p> <p>Planning applications often make passing comment regarding their aim to provide a 'safe environment', but on the whole I find this mainly refers to health &amp; safety aspects and not security.</p> <p>As the Designing Out Crime Officer, my role within the planning process is to give advice on behalf of Norfolk Constabulary in relation to the layout, environmental design and the physical security of buildings, based upon the principles of Crime Prevention through Environmental Design* (CPTED) and security measures recommended in Secured by Design (SBD) Homes 2019 guidance. Therefore, I seek input on this matter within the Neighbourhood plan to influence future plan-making process in such matters.</p> <p><i>*CPTED principles underpin the national police initiative, Secured by Design (SBD) which promotes the adoption of crime prevention measures. <a href="http://www.securedbydesign.com">www.securedbydesign.com</a></i></p> <p>The early adoption of these principles in the Saham Toney Neighbourhood Plan will be a significant step towards protecting the area for future generations; and in utilizing SBD practice, Saham Toney will benefit by reducing the opportunity for crime and the fear of crime to occur, thereby creating a safer, more secure and sustainable environment.</p> <p>In asking for this reference to be incorporated in the appropriate section of the Neighbour Plan, I would be happy to discuss this further with you – if not now, at the appropriate moment.</p> <p>Kind regards,</p> <p>Penny Turner</p> <hr/> <p><b>Penny Turner</b></p> <p><b>Designing Out Crime Officer</b> <b>Norfolk Police</b> Community Safety Neighbourhood Policing Team</p> <p>Email: <a href="#">email withheld</a></p>	
<b>RELEVANT SECTION(S) OF PLAN:</b> Policy 3A	
<b>REACTION TO REPRESENTATION(S)</b> <p>The following clarification was sent to the responder on 25 June 2020: Subject: Your comments on the Saham Toney Neighbourhood Plan June 2020</p>	

Dear Penny,

Many thanks for your comments on our Neighbourhood Plan, which I would like to explore further with you.

With regard to CPTED, I am currently unable to find that document in the public domain. Are you able to send me a copy? Or is that unnecessary because it underpins the Secured by Design initiative and hence is covered by the latter?

During our second Reg. 14 consultation (August-October 2019) you kindly sent comments on our Plan as it stood at that time. Your second comment recommended: "The Neighbourhood Plan should include a policy that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by the objective to 'create and maintain a safer community and reduce crime and disorder' (which your first comment recommended we should add)."

We discussed your previous comments with our planning policy consultant and gave our reaction and proposed actions in our draft Consultation Statement, which is available as part of the present consultation. To save you looking that up, we wrote:

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

**Comment 2:** Policy 3A as published at Regulation 14 (August 2019) states: "Proposals shall be in accordance with the principles set out in the Police initiative "Secured by Design", which covers the first suggestion in the comment. The addition of a further criterion under P3A.7 to reflect the suggested "All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety", will be considered in conjunction with comment 1, but may be unnecessary since that is an inherent requirement of "Secured by Design" which the policy already references. There is no need to create a new policy to deal with this"

As a result, we took no action regarding your first comment at that time.

With regard to your second comment on that consultation we wrote "Policy 3A criterion P3A.7g (previously sub-item b) amended from "Be in accordance with the principles set out in the Police initiative "Secured by Design." to "Be in accordance with the principles set out in the Police initiative "Secured by Design", and include appropriate measures aimed at improving community safety".

This actually became criterion P3A.7 (b) in the current version of the Plan with a little refinement following informal review by our LPA and now reads "Proposals shall be in accordance with the principles set out in the Police initiative "Secured by Design", and development proposals aimed at improving community safety will be supported."

Having made this clear reference to 'Secured by Design', I do not consider it necessary to repeat its guidelines / requirements explicitly in Policy 3A: indeed, our LPA would reject that as failing to adhere to the NPPF requirement for policies to be concise. The criterion is a firm requirement as it includes the conditional verb 'shall' (whereas our LPA would prefer it to say 'should' - advice we have declined, because we see this as important).

Hence, I would respectfully suggest the Plan as published has already adopted the principles you note with a suitable and appropriate reference. Additionally, our Parish Design Guide (already accepted by the LPA as a material consideration in planning matters) expands a little on the policy criterion by stating:

"10.4 Reference shall be made to the guidance given in the most up-to-date published version of "Secured by Design" (an official police security initiative), which covers a wide range of aspects relating to crime prevention and security, including:

- a) The layout of roads and footpaths;
- b) Footpath design;
- c) Communal areas;
- d) Property boundaries and rear access;
- e) Layout and identification of dwellings;
- a) Parking;
- b) Planting;
- f) Door-set standards; and
- g) Windows and roof-lights.

10.5 Open spaces must be designed with due regard for natural surveillance, and care should be taken to ensure that the security of a lone dwelling will not be adversely affected by the location of amenity space.

10.6 Communal areas, such as playgrounds and seating areas have the potential to generate crime, the fear of crime and anti-social behaviour. They should be designed to allow supervision from nearby dwellings with safe routes for users to come and go.

10.7 Boundaries between public and private space should be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces should not immediately abut residential buildings."

The design guide also mentions security in connection with street lighting and parking.

The Guide forms part of the present consultation, and if you have time to review it with regard to the issues you work with, I'd be glad of any recommendations you might have to improve it.

I look forward to hearing your views on the approach we are taking, and will be happy to discuss any remaining concerns further.

Thanks again for your interest in our Plan.

Kind Regards,  
Chris

-----  
Chris Blow  
Work Group Leader  
Saham Toney Neighbourhood Plan Committee

The reply received was as follows:

**Architectural Liaison (NC)**

to me 25 June 2020

Dear Chris,

Thank you for your speedy and comprehensive reply - I have taken on board all the points you have raised/explained and am happy with the reassurances that reference to Secured by Design principles are within Policy 3A and again in the Parish Design Guide – as you say no further repetition necessary.

I will not be commenting on the present consultations but am glad of this confirmation from previous policy deliberation. All the best as you move forward with the Neighbourhood Plan.

Kind regards,



Penny
<b>Penny Turner</b>  <b>Designing Out Crime Officer</b> <b>Norfolk Police</b> Community Safety Neighbourhood Policing Team  Email: <a href="#">email withheld</a>
<b>ACTION TAKEN:</b> None required

#### C4.3: Representation by George Freeman MP

<b>CONSULTEE:</b> George Freeman MP	<b>DATE:</b> 25 June 2020
<b>REPRESENTATION(S):</b> As part of my ongoing work to help communities in Mid Norfolk create their own Neighbourhood Plans, I am delighted to promote the efforts of Saham Toney Parish Council. The Neighbourhood Plan is a hugely important piece of work for the community – helping to determine how they would like the village to grow over the next two decades. I would encourage everyone associated with the village to take the time to look over the documents and share their views as part of the consultation.	
<b>RELEVANT SECTION(S) OF PLAN:</b> General	
<b>REACTION TO REPRESENTATION(S)</b> Gratefully acknowledge our MP's support	
<b>ACTION TAKEN:</b> None required	

#### C4.4: Representation by the Environment Agency

<b>CONSULTEE:</b> The Environment Agency	<b>DATE:</b> 30 June 2020
<b>REPRESENTATION(S):</b> <b>Benn, Neville</b> to me 30 June 2020  Dear Chris  We have no comment to make. We consider any aspect within our remit can be picked up at the planning application stage. Please see attached matters within our remit.  You should be aware that there are some foul drainage capacity issues in your area. I would suggest a conversation with Anglian Water.  Kind regards  <b>Neville Benn</b> Senior Planning Advisor Sustainable Places	

<p>East Anglia Area (West)</p> <p>✉ Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE</p> <p>☎ Internal: 51906</p> <p>☎ External: 0203 0251906</p> <p>Attached file: "East Anglia Pre-Application Planning Advice Guide", The Environment Agency, May 2018</p>
<p><b>RELEVANT SECTION(S) OF PLAN:</b></p> <p>Not applicable</p>
<p><b>REACTION TO REPRESENTATION(S)</b></p> <p>Noted. File attached to representation is for information only and not of specific relevance to the Neighbourhood Plan</p>
<p><b>ACTION TAKEN:</b></p> <p>None required</p>

#### C4.5: Representation by Norfolk Constabulary

<p><b>CONSULTEE:</b></p> <p>NPS Property Consultants on behalf of Norfolk Constabulary</p>	<p><b>DATE:</b></p> <p>10 July 2020</p>
<p><b>REPRESENTATION(S):</b></p> <p>Dear Sir</p> <p><u>Saham Toney – Neighbourhood Plan – Response to Regulation 14 Consultation</u></p> <p>I refer to the above plan and your request for comment. NPS is commissioned by Norfolk Constabulary to prepare representations on such planning policy matters. Therefore on behalf of Norfolk Constabulary, I would make the following comments</p> <p>Norfolk Constabulary have the responsibility for policing making Norfolk a safe place where people want to live, work, travel and invest in.</p> <p>Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91 which states</p> <p><i>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; ....</i></p> <p>Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live. The references to this initiative is welcomed in Policy 3A (Design) and Guiding Principle 7 of the Plan.</p> <p>In terms of creating and maintaining safer communities, there are a number of measures that should be embedded in the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area.</p> <ol style="list-style-type: none"> <li>1. The Neighbourhood Plan should include within its provisions a specific objective to ‘<i>create and maintain a safer community and reduce crime and disorder</i>’.</li> </ol>	

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

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

Yours faithfully  
Andy Scales

Copy to Duncan Potter (Norfolk Constabulary – Head of Estates)

**Andy Scales** Head of Planning Consultancy

#### **NPS Property Consultants**

T +44 (0) 1603 706150  
E [email withheld](#) W [nps.co.uk](http://nps.co.uk)

Nautilus House 10 Central Avenue Norwich NR7 0HR

#### **RELEVANT SECTION(S) OF PLAN:**

Comment 1 applies to section 5.2  
Comment 2 applies to Policy 3A: Design  
Comment 3 applies to Policies 1 and 3A.

#### **REACTION TO REPRESENTATION(S)**

The comments are an exact duplicate of those provided by Norfolk Police on 21 August 2019 in response to the Regulation 14 consultation of August-October 2019. See Appendix B4.3.  
Comment 2 also addresses the same issue as that raised in Norfolk Police's response of 25 June 2020, to this third Regulation 14 consultation, by Penny Turner, Norfolk Police Designing Out Crime Officer. Appendix C4.3 gives details of correspondence with Ms Turner which highlighted to her satisfaction that the Neighbourhood Plan already adequately references 'Secured by Design'  
Because of the comment duplication, the same reaction applies to comments 1 and 3 as for the previous consultation, follows:

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

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

They must be:

- d) necessary to make the development acceptable in planning terms;
- e) directly related to the development; and
- f) fairly and reasonably related in scale and kind to the development.

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

**ACTION TAKEN:**

None required

## C4.6: Representation by Natural England

<b>CONSULTEE:</b> Natural England	<b>DATE:</b> 23 July 2020
<b>REPRESENTATION(S):</b> Date: 23 July 2020 Our ref: 320473, 320482 Your ref: n/a Chris Blow Saham Toney Neighbourhood Plan Steering Committee Work Group <a href="mailto:stnp2036@gmail.com">stnp2036@gmail.com</a>  <b>BY EMAIL ONLY</b> Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ  T 0300 060 3900  Dear Mr Blow  <b>Saham Toney Neighbourhood Development Plan - Third Regulation 14 Pre-submission</b> <b>Saham Toney Neighbourhood Development Plan - Consultation on the SEA</b>  Thank you for your consultation on the above dated 24 June 2020.  Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Richard Hack  
Norfolk & Suffolk Team

**RELEVANT SECTION(S) OF PLAN:**

Whole plan

**REACTION TO REPRESENTATION(S)**

Noted

**ACTION TAKEN:**

None required

#### C4.7: Representation by National Grid

**CONSULTEE:**

Avison Young on behalf of National Grid

**DATE:**

29 July 2020

**REPRESENTATION(S):**



Central Square  
South Orchard Street  
Newcastle upon Tyne  
NE1 3AZ  
T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

**[avisonyoung.co.uk](http://avisonyoung.co.uk)**

Our Ref: MV/15B901605

29 July 2020

Saham Toney Neighbourhood Plan Committee  
[stnp2036@gmail.com](mailto:stnp2036@gmail.com)  
**via email only**

Dear Sir / Madam

Saham Toney Neighbourhood Plan Regulation 14 Consultation  
June – August 2020

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

#### Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

**Matt Verlander, Director Spencer Jefferies, Town Planner**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com) [box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI Director**  
**0191 269 0094**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com) For and on behalf of Avison Young

#### **RELEVANT SECTION(S) OF PLAN:**

All

#### **REACTION TO REPRESENTATION(S)**

Noted

#### **ACTION TAKEN:**

None required

## **C4.8: Representation by Norfolk County Council**

**CONSULTEE:**

**DATE:**

**REPRESENTATION(S):**

NCC comments on the Saham Toney NP Reg 14 no.3

**Reg 14 (3) Consultation Responses**

Dear Chris

Thank you for consulting Norfolk County Council on the Saham Toney NP Reg 14 (round 3).

Norfolk County Council only has Highway Authority comments on the NP Reg 14 (round 3), see attached.

Best wishes,

Naomi

**Naomi Chamberlain, Planner**

Community & Environmental Services

Tel: 01603 638422

County Hall, Norwich, NR1 2DH

Attachment:

**Norfolk County Council Comments on the: Saham Toney Neighbourhood Plan (Reg 14) no.3  
August 2020**

**1. Preface**

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

1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.

**2. Transport**

2.1. Please see below the specific Highway Authority comments on the proposed site allocations.

Site reference	Comments
<b>SNTP1</b>	<b>OK</b> subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F. Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy.

<b>SNTP2</b>	The Highway Authority <b>objects</b> to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
<b>SNTP4</b>	<b>OK</b>
<b>SNTP7</b>	<b>OK</b>
<b>SNTP9</b>	<b>Object</b> on the basis of the letter contained in the site assessment appendix. Lack of footways – this is identified as the main concern and the proposal does not address this.
<b>SNTP13</b>	The Highway Authority <b>objects</b> to this allocation. - There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
<b>SNTP14</b>	The Highway Authority <b>objects</b> to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
<b>SNTP15</b>	The Highway Authority <b>objects</b> on the basis that it is not demonstrated that adequate visibility can be achieved. This cannot be left to a general policy. It is fundamental to the allocation, without evidence it cannot be shown that the site is safe and meets basic conditions.
<b>SNTP16</b>	<b>OK</b> subject to access through adjacent development and that access being capable of serving both sites.

2.2 The Highway Authority cannot agree to allocation that does not provide suitable pedestrian provision and a number of these sites do not. The NP could still meet basic conditions if these sites are removed as it can still provide the numbers the Local Plan requires on safe suitable sites.

2.3. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [email withheld or call](#) 01603 223263.

#### **RELEVANT SECTION(S) OF PLAN:**

Policies 2H-2P

#### **REACTION TO REPRESENTATION(S)**

Comments 1.1 & 1.2: Noted

Comment 2.1: See Table C4.8 below

Comment 2.2: As was pointed out in response to similar comment in response to the second Regulation 14 consultation (see B4.8), a lack of footway provision is not a matter for the basic conditions. The Neighbourhood Plan, including the allocation of the sites objected to, meets the basic conditions.



Comment 2.3: Noted

**ACTION TAKEN:**

**Comments 1.1, 1.2 & 2.3:** None required

**Comment 2.1:**

**STNP1:**

- a) A requirement for visibility splays to be free of obstruction to a height of 0.6m has been added to Policy 2F;
- b) Appropriate highway improvement measures have been added to Policy 2H;
- c) A requirement to prevent surface water discharge onto the highway has been added to general policy 2F.

**Sites STNP2, 4, 7, 9, 13, 14, 15 and 16:** None required.

**Comment 2.2:** None required

Highway Authority Comment	Reaction
<b>STNP1: OK</b> subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F. Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy.	<p>Planning application 3PL/2015/1430/F was withdrawn prior to being decided and hence no conditions apply to it, since conditions can only be set by the Local Planning Authority. In its representation to the application the Highways Authority requested 6 conditions should the application be permitted. Those are given in Figure B2 in Appendix B of the Site Selection Report, and each is addressed below:</p> <p><b>SHC 20</b> required 59m x 2.4m visibility splays ‘to be maintained free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway’. The splay requirement is given in Policy 2F, and it is noted that the Local Planning Authority required that, as opposed to repeating identical requirements in each site allocation policy.</p> <p><b>SHC 24</b> required on-site car parking and turning to be laid out in accordance with the approved (application) plan. This is not appropriate to include in policy, (a) because it would be deemed restrictive detail; (b) the site boundary and masterplanned layout differs from that proposed at the time of the application.</p> <p><b>SHC 29A and SHC 29B</b> required a construction traffic management plan, and compliance with that during construction. The specification of such a document and adherence to it is not appropriate to include in policy, even more so as the Highways Authority proposes that for only one of the nine allocated sites.</p> <p><b>SHC 39A and SHC 39B</b> required highway improvement works be completed before commencement of onsite work. Given the changes to the site boundary since that proposed in the application, it is not appropriate to simply refer to the drawing of highway improvements</p>

	<p>submitted in support of the application, but additional measures will be added to the site allocation policy to reflect the intention of those improvements.</p> <p><b>SHC 50</b> required measures to prevent discharge of surface water from the site to the highway. This is equally applicable to other sites and so will be added to Policy 2F.</p>
<p><b>STNP2:</b> The Highway Authority <b>objects</b> to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area</p> <p>Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics</p>
<b>STNP4: OK</b>	Noted
<b>STNP7: OK</b>	Noted
<p><b>STNP9: Object</b> on the basis of the letter contained in the site assessment appendix. Lack of footways – this is identified as the main concern and the proposal does not address this.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>The letter noted is given in Figure B6 of the Site Selection report. It states that subject to the site being limited to 2-3 houses the required footway provision is along the site frontage, and that only if additional houses are developed would more extensive footway provision be required. Policy 2L makes clear the site is allocated for 'up to 3 dwellings' and includes a requirement for a site frontage footway, and is hence in accordance with the Highways Authority letter noted in the comment.</p>
<p><b>STNP13:</b> The Highway Authority <b>objects</b> to this allocation. - There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area</p>

	Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics
<b>STNP14:</b> The Highway Authority <b>objects</b> to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.	The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics
<b>STNP15:</b> The Highway Authority <b>objects</b> on the basis that it is not demonstrated that adequate visibility can be achieved. This cannot be left to a general policy. It is fundamental to the allocation, without evidence it cannot be shown that the site is safe and meets basic conditions.	The objection is noted but not accepted. It has been demonstrated in both the supporting text to Policy 2O, in Policy Map 2F.8 and the Saham Toney Neighbourhood Plan Transport Study that adequate visibility may be provided. This has been done by means of scale drawings, precisely as required by the Highways Authority in its response to the second Regulation 14 consultation, 2019 (see B4.8 of this statement)
<b>STNP16:</b> <b>OK</b> subject to access through adjacent development and that access being capable of serving both sites.	Noted. Adequate access has been demonstrated in the Saham Toney Neighbourhood Plan Transport Study and is shown on Policy Map 2F.9 and suitable access through the adjacent development is a requirement of Policy 2P, and is indicatively indicated on Policy Map 2G.2
	General reaction: It is respectfully pointed out that each allocated site remains subject to the submission of a satisfactory planning application, at which stage the Highways Authority is at liberty to raise concerns and request any site-specific conditions, but the objections given do not justify removal of sites from allocation

**Table C4.8: Responses to Highway Authority Comments**

## **C4.9: Representation by Anglian Water**

<b>CONSULTEE:</b> Anglian Water	<b>DATE:</b> 14 August 2020
<b>REPRESENTATION(S):</b> Thank you for the opportunity to comment on the third Pre-submission Neighbourhood Plan. The following response is submitted on behalf of Anglian Water.	

### **Policy 5: Saham Toney Rural Gap**

In our comments we had previously raised concerns that Policy 5 as drafted required Anglian Water as an infrastructure provider to demonstrate a need for development to be located within the designated Rural Gap.

We note that Policy 5 has been amended to address our previous comments and is therefore supported.

### **Policy 8A: Surface water management general provisions**

We note that Policy 8A (formerly Policy 8) has been amended significantly and includes additional text to that which appeared in the earlier version.

P8A.5 – reference is made to the water undertaker (Anglian Water) commenting on proposals where it is proposed to make a surface water connection to the public sewerage network irrespective of scale. The justification for this requirement appears to be the LLFA's guidance on its roles as a statutory consultee for planning applications.

Anglian Water generally comments on proposals of 10 or more dwellings or 0.5 ha or more for non-housing uses. On request from the relevant planning authority we provide comments on development proposals below this threshold and in doing so we ask that they provide reasons of any issues they wish us to consider in our response. It is also important to note that in this context we are a sewerage undertaker as opposed to water undertaker as referred to in Policy 8A.

P8A.6 – reference is made to Local Highway Authority confirming that there is capacity within the public sewerage network to receive additional surface water flows. Anglian Water as sewerage undertaker would comment on the available capacity to receive surface water flows and our expectation is that any proposed surface water connection to a foul or combined sewer would be considered as a last resort only subject to evidence of the surface water hierarchy having been followed.

P8A.7 – reference is made to Sewers for Adoption Edition 8.

A further version of Sewers for Adoption Version 8 was subsumed within the sector's work to implement Ofwat's Code for Adoption Agreements. This code requires the water sector to prepare guidance on both water and sewerage asset adoption. That guidance must include "Design and Construction Guidance" and it is that document (also known as the DCG) which now contains details of the water sector's approach to the adoption of SuDS which meet the legal definition of a sewer.

We would look adopt to SuDs features which meet the legal definition of a sewer and meet the requirements as outlined in the DCG guidance and other related drainage guidance including that produced by Anglian Water.

There are also options available for the options for the adoption and maintenance of SuDS particularly for those that don't meet the legal definition of a sewer including Norfolk County Council as Highways Authority, Breckland District Council (where agreed as part of a S106 agreement) or a maintenance company.

It is therefore suggested that Policy 8A is amended as follows:

'P8A.5 All proposals in areas of high, medium or low risk of surface water flooding, regardless of development size, shall be reviewed by the Lead Local Flood Authority (for the means of surface water disposal) and the Statutory ~~Water~~ **Sewerage** Undertaker (where surface water is proposed to be discharged into the public sewerage network) prior to being decided **upon request from Breckland Council**.

P8A.6 Permission for proposals for which no other practicable alternative exists to dispose of surface water other than a public sewer, shall only be granted if it is confirmed by Anglian Water, ~~the Local Highways Authority, or their agents that there is adequate spare capacity in the existing system taking future development requirements into account~~ **that evidence has been provided by the applicant to demonstrate it does not increase flood risk both within the development and elsewhere and that the surface water hierarchy has been followed.**

‘P8A.7 As a condition of their adoption **by Anglian Water**, SuDS drainage schemes **which meet the legal definition of a sewer** shall comply with the guidelines given in Water UK’s ~~“Sewers for Adoption”, Edition 8, 2019~~ **Design and Construction Guidance March-2020**, or any more up to date version made available, and with the most up to date version of CIRIA 753, The SuDS Manual’

#### **Policy 8B: Surface water run-off and discharge rate and volume**

Reference is made to detailed requirements for surface water discharge rate and volumes.

In respect of any surface water connections to the public sewerage network we would expect the discharge rate to be agreed with Anglian Water consistent with the guidance outlined in our [Surface Water Drainage Policy](#).

#### **Policy 8C: Policy on Infiltration testing**

Anglian Water welcomes the requirement for developers to undertake infiltration testing to establish whether surface water infiltration is feasible.

#### **Policy 8D: Surface Water Flood Risk and Climate Change**

Anglian Water welcomes the requirement for developers to make an allowance for climate change when considered surface water discharge.

In respect of any surface water connections to the public sewerage network we would expect the discharge rate to take account of climate change consistent with the guidance outlined in our [Surface Water Drainage Policy](#).

#### **Policy 8F: Management and maintenance of Sustainable Drainage Systems**

Anglian Water welcomes the requirement for developers to provide a SuDs Management and Maintenance Plan setting out who will responsible for any ongoing maintenance of SuDs.

#### **Policy 8H: Design of Sustainable Drainage Systems**

We note that an additional policy relating to the design of Sustainable Drainage Systems has been added to the Neighbourhood Plan following the previous consultation.

Anglian Water is supportive of the statement that SuDs are the preferred method of surface water drainage and that any SuDs being put forward for adoption by Anglian Water should meet the required design standards.

#### **Policy 9: Sewerage provision**

We note that a separate policy for sewerage provision has been added to the Neighbourhood Plan we are generally supportive of this policy as drafted subject to some detailed comments.

P9.6 - As set out above a further version of Sewers for Adoption Version 8 was subsumed within the sector’s work to implement Ofwat’s Code for Adoption Agreements

It is therefore suggested that Policy 9 is amended as follows:

'P9.6 Foul sewers shall comply with the guidelines given in "~~Sewers for Adoption~~", ~~Edition 8, 2019~~ **Design and Construction Guidance March 2020**, or any more up to date version made available.'

#### Habitats Regulation Assessment

Reference is made to a potential increase in water abstraction due to the additional development at Saham Toney having an adverse impact on Norfolk Valley Fens SAC (page 14 of report).

However Anglian Water is not proposing to increase the level of water abstraction as a result of the scale of development anticipated in the Neighbourhood Plan or growth anticipated within the company area as outlined in our approved Water Resource Management Plan.

I would be grateful if you could confirm that you have received this response.

Should you have any queries relating to this response please let me know.

Regards,  
**Stewart Patience, MRTPI**  
Spatial Planning Manager  
Telephone: 07764 989051

#### Anglian Water Services Limited

Anglian Water, Thorpe Wood House, Thorpe Wood, Peterborough, Cambridgeshire. PE3 6WT

#### RELEVANT SECTION(S) OF PLAN:

Policies 5, 8A, 8B, 8C, 8D, 8F, 8H and 9

#### REACTION TO REPRESENTATION(S)

Policy 5: Noted  
Policy 8A: Comments agreed  
Policy 8B: Comment agreed.  
Policy 8C: Noted  
Policy 8D: Noted.  
Policy 8F: Noted  
Policy 8H: Noted  
Policy 9: Agreed

#### ACTION TAKEN:

Policy 5: None required  
Policy 8A: Comments incorporated  
Policy 8B: Requirement regarding compliance with Anglian Water's Surface Water Drainage Policy added  
Policy 8C: None required  
Policy 8D: Discharge rate comment covered by the update to the Policy 8B noted above  
Policy 8F: None required  
Policy 8H: None required  
Policy 9: Suggested amendment made

#### C4.10: Representation by Historic England

<b>CONSULTEE:</b> Historic England	<b>DATE:</b> 14 August 2020
<b>REPRESENTATION(S):</b>	

## Ref: Saham Toney Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Saham Toney Neighbourhood Plan. We have reviewed the comments we made in October 2019, as well as the more recent 'Justification for Minimum Housing Target' document and Strategic Environmental Assessment produced for the neighbourhood plan group to support the plan. We will focus our comments on the site allocations proposed in the Saham Toney neighbourhood plan, and their potential effect on designated heritage assets. We note that the plan proposes to allocate land for c.70 residential units, and we also note that the minimum number considered necessary is 48 units, as set out in the justificatory document referenced above.

In general, we welcome the production of the neighbourhood plan, and in particular we commend the thought and effort that has obviously gone into its preparation. This is particularly related to the inclusion of considerable information relating to the parish's heritage assets, as well as its landscape character (Policies 6 and 7). We also appreciate the work that has gone into the development of policies supporting comprehensive masterplanning for major development sites.

We do not wish to make any comments on site allocations STNP1, STNP2, STNP4, STNP7, STNP9, STNP13, STNP14, or STNP16, and in general agree with the conclusion of the SEA that some enhancements to the setting of Page's Place may be possible through good landscape design. We make a general point regarding the design of highways infrastructure that also applies to Site STNP15, which we comment on below in more detail.

As you are aware, paragraph 185 of the NPPF requires that plans set out a positive strategy for the conservation and enjoyment of the historic environment, which *inter alia*, should take into account 'the desirability of new development making a positive contribution to local character and distinctiveness' and 'opportunities to draw on the contribution made by the historic environment to the character of the place'. Paragraph 190 highlights that any proposals should avoid or minimise any conflict between the heritage asset's conservation and *any aspect of the proposal* (my italics). Paragraph 193 makes clear that great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Paragraph 194 goes on to state that any harm or loss should be clearly and convincingly justified. Paragraph 124 makes clear that good design is a key aspect of sustainable development, whilst Paragraph 127 requires that developments are visually attractive as a result of good architecture, layout and appropriate landscaping, as well as being sympathetic to local character and history.

As the SEA and draft neighbourhood plan identifies, site STNP15 lies in close proximity to the Old Rectory (Grade II), and the parish Church of St George (Grade I). The latter is an asset of the highest significance, as identified in the National Planning Policy Framework, and is therefore afforded the highest weight.

The development of this site has the potential to negatively affect the setting of both of these heritage assets, owing to the densification of this relatively small plot, and the addition of an unnecessarily over engineered entrance junction immediately opposite the principal entrance to the Old Rectory, and in the near vicinity of the church's boundary. At present, Richmond Road enjoys a pleasant rural quality, unencumbered by intrusive highway and junction infrastructure, as befits its history and character. A 4.5m carriageway width, as specified, and 2.4m set back visibility splay is appropriate for a busy main road in an urban setting, but not for a narrow access street for six residential units in a rural village location, and this would not constitute good design. We would refer you to the section 7.2 of the government's best practice guidance, 'Manual for Streets', as well as page 26 of 'Manual for Streets 2'.

The latter, in paragraph 2.7.1.1 makes clear that DMRB standards for highways are not appropriate in rural settings.

Having regard to the requirements of national policy, we do not consider that the potential harm this development would cause to the setting of the two adjacent listed buildings, albeit of a relatively low level, is justified. The adjusted minimum housing requirement of 48 in the document referenced above would safely be met were site STNP15 removed from the plan, and this would therefore avoid any harm to these two designated heritage assets. We are not convinced by the point that these units would themselves 'future proof' the neighbourhood plan in a meaningful way. We therefore recommend that this site allocation is not included.

The general point regarding highway dimensions and infrastructure is also relevant to all of the other proposed entrances to proposed sites, where over engineered overly junction of urban character may not be necessary or appropriate for Saham Toney's pleasant rural character.

We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

[<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/).

For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Norfolk County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

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

Edward James

Historic Places Advisor, East of England

#### RELEVANT SECTION(S) OF PLAN:

Policies 2F and 2O

#### REACTION TO REPRESENTATION(S)

Policy 2F: Details of site access are a matter for the Local Highways Authority.

**Policy 2O:** With regard to potential impact of site STNP15 on the setting of St George's Church and the Old Rectory, the comment notes that may be 'of a relatively low level'. It is therefore considered that removal of the site from allocation simply on the basis of only the possibility of low-level impact is not justified.

Under Policy 2E: Housing Mix, dwellings on the site will be of three or fewer bedrooms and therefore on a small scale. There is no evidence to suggest it will not be possible to deliver an attractive site, fully respecting the setting of nearby heritage assets and local character. Indeed, it might be considered that such a well-designed development would add to the setting. The nearby Church Barns complex to the south-east is a good example of what may be achieved in this respect.



With regard to the Old Rectory, that building is barely experienced from the part of Richmond Road in which STNP15 is located. It is set well back from the road and well screened by a high brick wall and well-established trees and hedges along its boundary.

The STNP15 site slopes quite sharply away from Richmond Road, meaning any development impact may more readily be addressed by using the elevation of the land to effectively blend it in without harmful impact of the street scene.

Neither the Church or the Old Rectory publicly visible looking through the development site.

The site is no nearer the Church than Parker's Close on Pound Hill, which comprises 5 large dwellings, which was permitted within the last 12 years. It is of modern style and discordant with the character of the immediate area. If its impact was deemed acceptable when approved, then it is clear a more sympathetic scheme is achievable at STNP15.


**ACTION TAKEN:**

Policy 2F: None required

Policy 2O: Reference to the Old Rectory and nearby non-designated heritage assets has been added to the policy with regard to a requirement for a Heritage Impact Statement.

A policy criterion has been added to emphasise the need for sensitive design of the site.

## APPENDIX C5. Pre-Submission Consultation June-August 2020: Parishioner Comments and STNP Responses

RESPONDENT NUMBER: 1	DATE: Various as noted
<p><b>RESPONSE 1: 24 June 2020</b></p> <p>We found a few of the pictures taken in June (2016) at the time of the flooding. The water came rushing in down Pages Lane and entered under the gate and followed the concreted roads in Page's Farm fields which on your plans appear to be the road accessing the future estate. We appreciate that a narrow area will be kept between Pages Place and the newly built estate. Unless a pond or a deep ditch is dug along our boundary with the estate, we shall never be able to keep the excess waters out.</p> <p>Thank you for your time and attention to those important details.</p> <p>We are supporting your great work and plans, as long as you take in consideration those worrying facts of life and unruly natural phenomena.</p> <p>Good luck for the future success of your important work for the village.</p> <p>Stay safe and healthy.</p> <p><i>Names removed for confidentiality</i></p> 	



## RESPONSE 2: 27 June 2020

A few more pictures sent by my son to remind us of the issues we had four years ago. The fields' underground 10in clay pipes and the five manholes built around the pig sties and old barns couldn't cope with the amount of surface water running along those concrete paths. We hope those can be helpful to help with securing those new future buildings.









**RESPONSE 3: 6 July 2020 (reply to STNP email of the same date):**

Chris

Thank you for your message to us showing the various drawings and potential mitigations for the flood risk brought by the proposed development on the site of Pages Place Farm.

It is very interesting that when the floods came in 2016, surprisingly, given the drawings you show, they did not come from the North and North West corner of our property. The water came from the bursting banks of the higher land drain at the top of pages lane, down the road, in at the gate of the farm and across the already sodden field, exactly where you want to build.

The water came into the Manor building from the South West entrance and flowed through from there.

The flooding to Moatside was similarly first through their front door off the southern lay-by and NOT from the drain at the North.

This is why {name removed} built his front wall and the "speed bump" at the top end of the layby, to stop recurrence of the "mini tsunami" that came down Pages Lane as discussed above.

That the drain to the North of both our houses was overwhelmed in 2016 was, therefore, a secondary, not primary, cause of flooding.

My land was flooded because it lies lower than Fickling's field and when the top ditch overflowed, it ran down the road and in through the gate to drain into our northern ditch, not because the ditch overflowed in its normal run.

You make a couple of "asides" points in your notes concerning my own property and planning which are incorrect and need to be addressed.

If you care to drop by, I will show you the aerial photos of my house in 1963. It shows the entire footprint of the original house, including, to the North end, the Victorian dairy, scullery, paved enclosed courtyard and attached outbuildings. All the buildings from the dairy to the northernmost outbuilding were demolished under the first planning permission. The "extension" to be rebuilt is almost exactly in the same footprint and will have no more impervious surface than the original building.

In addition, while it is not a "condition" of my 2018 permission, I have built a rain water recuperation system into my plans to achieve "grey water flush" for my lavatories and to defend my home from the potential flooding from the same direction as in 2016.

Accordingly, your criticisms of my permission are entirely unwarranted and the designation of my house as the epicentre of the flood plain slightly skewed.

Yours sincerely

*Name removed for confidentiality*

#### **RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2F, 2K, 8A – 8G

#### **REACTION TO REPRESENTATION(S):**

The following response was sent to the respondent on 6 July 2020 with regard to Responses 1 and 2:

Dear {*name removed for confidentiality*},

Thanks again for your comments and many photos of the 2016 flood.

We have reviewed how the Plan's policies deal with your concerns and would like to draw your attention to the following requirements in the current version of the Plan:

<b>Policy criterion</b>	<b>Remarks</b>
<b>P8A.2</b> All development proposals coming forward within the areas of high, medium and low risk from surface water flooding as identified by the Environment Agency in its up to date online maps, shall include a site-specific Flood Risk Assessment that gives adequate and appropriate consideration to all sources of flooding and the proposed method of surface water drainage.	In the case of STNP7, reference to "all sources of flooding" means surface water flowing along Page's Lane, entering Page's Farm and then passing onwards to your land, must be included in the assessment
<b>P8A.3</b> All proposals shall have a neutral or positive impact on surface water drainage.	This means development of a site is not allowed to result in increased flood risk elsewhere
<b>P8B.5</b> If control to greenfield runoff volume is considered unachievable, then any excess runoff volume shall be temporarily stored and released at a rate no more than 2l/s/ha.	This is a fallback, set by national guidance to ensure surface water dissipates slowly, rather than at the rates seen in 2016. For site STNP7 it would mean surface water could only be released from the site at a rate not exceeding 1.08 litres per second. To put that in context if we have 1mm of rain that results in 1 litre on every square metre of land, and clearly 1mm of rain is not a flood condition
<b>P8B.9</b> Where runoff from off-site sources is drained together with the site runoff, the contributing catchment shall be modelled as part of the drainage system in order to take full account of the additional inflows to the site.	This means that surface water flowing onto site STNP7 from Page's Lane or from the fields to the west, must be included in calculations to determine the necessary capacity of the site's drainage system
<b>P8B.10</b> Where runoff from off-site sources is conveyed separately to a site's proposed drainage system the flood risk should be managed in accordance with the most up	Again, this deals with surface water flowing onto a site from an external source. We don't have access to this British Standard as



to date version of BS8533: "Assessing and managing flood risk in development – code of practice".	it is only available at a cost of about £200, but reference to it is recommended by national guidance and drainage consultants will have a copy
<b>P8F.2</b> Proposals shall sufficiently consider the likely maintenance requirements of new and existing drainage infrastructure over the design life of a development, including those for ordinary watercourses that are bounded by, or within a development site.	This will mean that existing ditches bordering the site will need to be restored to good working condition, thereby slowing the flow of water onto the site
<b>P8H.15</b> Where applicable, design of SuDS systems shall include measures to improve land drainage via watercourses or ditches that form part of a site or run adjacent to its boundary, and make adequate provision for their future maintenance.	As previous point
<b>P8H.17</b> Design of temporary drainage for the construction phase shall be included where necessary and shall demonstrate construction activities will not lead to an increase in flood risk.	This ensures that flood risk is also addressed during construction – a phase when ground is likely to be compacted and less able to provide natural drainage

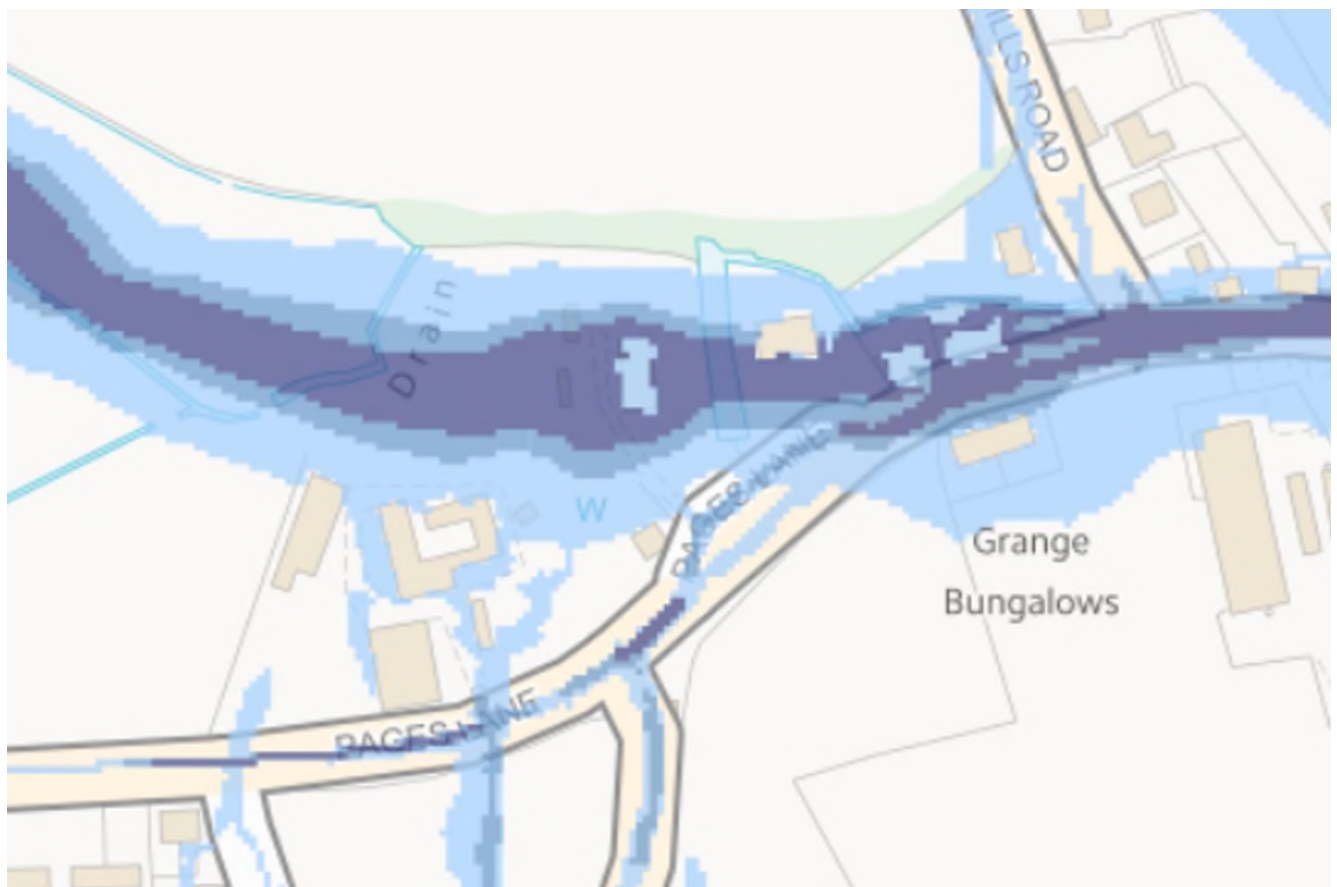
Additionally, the masterplanned site layout for STNP7 included in policy 2G and the site-specific policy 2K specify green areas for surface water attenuation measures, specifically, that "a bio-retention area or infiltration area shall be provided in the area of the site's greatest risk of surface water flooding, with a minimum length / area that calculations demonstrate to be adequate to prevent flood risk to properties and/or off-site".

You can see that in the site layout shown below, which development must adhere closely to:



The mocked-up picture below shows the slightly wider picture in your area. As you can see, we reduced the site size from what was proposed by the owners such that it avoids the area of highest

flood risk. I have only shown that risk area approximately but I also include below the detailed risk map of the area for your reference, the darkest shade being the highest risk. As I hope you will appreciate, the green area above serves a dual purpose in that it is also intended as a means of conserving the setting of Page's Place.



Perhaps in theory it would additionally be possible to limit / prevent surface water flowing onto the site from Page's Lane or the field to the west by specifying some form of barrier (for example an earth bund and/or a hump plus drain at the site entrance). Our view is that to directly specify that would





risk contravening guidance that while anyone can protect their own property from flood risk, they cannot do that by increasing flood risk to other properties; and in this case if surface water was prevented from entering site STNP7 it would instead flow further along Page's Lane and/or to the stream and enter your land by a different route.

Additionally, it is not sensible for the Plan to specify precise details of measures to prevent flood risk: each site is unique and we would not wish to tie the hands of a designer who will know better than us the most appropriate solution for a particular site.

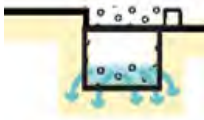















Another consideration is that STNP7 is a brownfield (i.e. already developed) site with not insignificant areas of roofs and hard-standing that in the case of the former, add to the amount of water falling onto the site and in the case of the latter, reduce the amount of natural infiltration that can take place. It is unlikely either incorporates any specific drainage, so both add to the amount of surface water runoff. Both will be demolished and while only detailed design of the site can give the full picture, there may well be less overall impervious surfaces when the site is developed, and there will certainly be an adequate and well-maintained drainage system, because that's what the Plan's policies require. This allows further confidence that the flood risk situation after development will actually be better than it is at present.




As you will see from the flood risk map, unfortunately your own property and much of your land lies in the area at highest risk of surface water flooding. As I have noted in the past, the Plan can only prevent flood risk from being made any worse by new development. But in fact, as I hope you will appreciate from the information herein, the measures we have taken should lead to a reduction in your risk. However, the Plan cannot stop nature or prevent you suffering from another event like 2016; the stream on your northern boundary will likely overflow at times and surface water will continue to flow across those parts of Page's Farm that are not included in site STNP7.

It is of interest to note that the application for your present renovation of Page's Place stated that the site is not in a designated flood risk zone. While that was true for river flood risk, as you know from experience, it was not true for surface water flood risk. Your consultant and Breckland Council's planners unfortunately did not pay attention to this fact. I say this not as a criticism, but simply to point out that if flood attenuation measures had been a condition of your planning permission, you would have less reason for concern now. As indeed would your neighbours, because as things stand, enlarging your property will inevitably lead to increased surface water runoff that will flow to the stream and onto neighbours' land. Trying to be constructive I'd like to highlight some things you might like to consider regardless of any planning conditions, once your work is complete and you perhaps turn your attention to landscaping:

SuDS component	Description	Setting	Required area
	A planted soil layer constructed on the roof of a building to create a living surface. Water is stored in the soil layer and absorbed by vegetation		Building integrated
	Rainwater is collected from the roof of a building and other paved surfaces, and stored in an underground or over ground tank for treatment and re-use locally. Such water may be used for toilet flushing and irrigation. On a smaller scale, water butts can also be used		Water storage



	<p>Designed to allow water to quickly soak into permeable layers of soil. Constructed like a dry well, an underground pit is filled with gravel or rubble. Water is stored in the soakaway and from there allowed to gradually seep into the ground</p>		<p>Open space</p> <p>Dependent on runoff volumes and soil type</p>
	<p>A grassed or planted area that runoff is allowed to run across to promote infiltration and cleansing</p>		<p>Open space</p> <p>Minimum length required = 5m</p>
	<p>Runoff is temporarily stored below the surface in a shallow trench filled with stone / gravel, providing attenuation, conveyance and treatment (via filtration)</p>		<p>Open space</p> <p>Minimum length required = 5m</p>
	<p>Paving which allows water to soak through. It can be in the form of paving blocks or porous paving where water filters through the paving itself. Water can be stored in the sub-base beneath paving or allowed to infiltrate into the ground below</p>		<p>Street / open space</p> <p>Can typically drain double its area</p>
	<p>A vegetated area with gravel and sand layers below, designed to channel, filter and cleanse water vertically. Water can infiltrate into the ground below or drain to a perforated pipe and conveyed elsewhere. Can be integrated with tree-pits of gardens</p>		<p>Street / open space</p> <p>Typical surface area is 5-10% of drained area with storage below</p>
	<p>A shallow, vegetated depression in the ground designed to convey and filter water. A swale can be 'wet', where water gathers above the surface before draining, or 'dry', where water collects in a gravel layer beneath. Can be lined or unlined to allow infiltration</p>		<p>Street / open space</p> <p>Account for width to allow safe, accessible maintenance: typically, 2-3 metres wide</p>
	<p>Can be used to store and treat water. 'Wet' ponds have a constant body of water and runoff adds to that, while 'dry' ponds are empty during periods of little / no rainfall. Can be designed to allow infiltration into the ground or to store water for a period of time before discharge. May require an outlet that restricts/ controls outflow, to ensure adequate attenuation</p>		<p>Open space</p> <p>Dependent on runoff volumes and soil type</p>
	<p>Shallow vegetated water bodies with a varying water level. Specially selected plant species are used to filter water. Water flows horizontally and is gradually treated before being discharged. Can be</p>		<p>Open space</p> <p>Typically, 5-15% of drainage area to provide good treatment</p>

	incorporated with a natural or hardscape environment		
Trees	Can be planted within a range of SuDS components to improve their performance, as root growth and decomposition increase soil infiltration capacity. Can also be incorporated as standalone features in soil-filled tree pits or tree planters	Open space 	
Underground storage 	Water can be stored in permeable crates beneath the ground to provide attenuation	Open space 	Dependent on runoff volume and soil type

I wouldn't pretend to be an expert and perhaps if any of the above are of interest you would be wise to get specialist advice on what might work best in your case.

I emphasise this is just some friendly advice, rather than trying to pressure you into anything.

I hope this addresses your concerns, but please feel free to contact me if you would like to discuss matters further.

Kind Regards,

Chris

The following was sent to the commenter on 9 July 2020, with regard to Response 3:

Dear {*name removed for confidentiality*},

Thank you for your latest email.

Firstly, I apologise for any offense caused by my previous remarks about your planning permission. I was not aware of your earlier application, but should have checked my facts. I have no need to view your evidence of the earlier property footprint: I am happy to accept what you say about that. Furthermore, I certainly had no intention to portray your property as an epicentre of the flood plain and I am sorry you have interpreted my note in that way. Yours is one of a number of properties that suffers from excess surface water runoff, the causes of which are a rather complex mix of natural processes, topography, underground drainage features that would benefit from improvement, and a failure by some landowners to carry out their obligations to keep watercourses clear. I was simply trying to point out that being in a high-risk area for surface water flooding, regardless of development on an adjacent site, that risk will remain. Of course, I commend you for incorporating rainwater harvesting into your plans, for both its flood risk reduction and water-saving benefits. It is one of a range of measures the Plan and Village Design Guide encourage new developments to implement. Taking account of your information about the route flood waters took along Page's Lane in 2016, we could perhaps add a requirement to the Plan for the developer of site STNP7 to implement appropriate measures to prevent surface water entering that site. But as I noted earlier, that water would then instead continue to flow along Page's Lane and perhaps enter your property (or those of others) by a different route. I would be interested to hear your views on introducing such a measure? As I understand things, one of the current problems is that the ditch along the north side of Page's Lane is very poorly maintained and so does not perform its intended function of draining both road and field and slowing the flow of water sufficiently to prevent / limit flooding. The Plan cannot enforce such improvements on the landowner upstream of site STNP7. Norfolk County Council could

and should do so. I believe they may undertake some investigations in the area when Covid-19 restrictions ease, but do not have any specific details of what they will review nor what may result from that review. Villagers as individuals or via the Parish Council should lobby the County Council for action to limit downstream flood risk.

If both sites STNP4 and STNP7 are developed, improvement to their boundary ditches will be a requirement under the Plan. In the light of your and other villager comments, we will now additionally consider if it would be appropriate to specify more precise requirements, for example as to the size and width of a renovated ditch. The danger of that is due to a lack of expertise we may underestimate the requirement and give developers a 'loophole'. It is probably better to have wording along the lines of "a renovated ditch (or wet and dry swale) shall satisfactorily contain and attenuate maximum surface water flows to prevent excess runoff over the site itself or onto neighbouring properties". The final version of such wording would have to be agreed with our policy consultant and Breckland Planning, but meanwhile I'd be interested in your opinion about this aspect?

We are also investigating whether the Plan could impose conditions on developers to contribute to the costs of drainage improvements in your area via S106 payments. We do not think those could be applied to improving ditches on private property, but a key aspect of the existing surface water drainage system is the size and condition of a culvert under the lower end of Hills Road and another that picks up water from the ditch on the north side of site STNP4 (we don't yet know the underground route of that one). We are waiting for advice from our consultant about what if anything the Plan may specify in this respect. If it were to be possible, it should actually mean the Plan leading to a reduction in existing flood risk, as well as preventing increased risk due to development, which it already does. (Subsequent advice from the STNP policy consultant, in an email dated 10 July 2020, highlighted that such a condition would not comply with the Town and Country Planning Act or Planning Practice Guidance, and so cannot be included in policy).

If things remain as they are, with no development of site STNP7, I cannot envisage much change in the flood risk your property is subject to, particularly with regard to water flowing off Page's Lane over Page's Farm and on to your land, as happened in 2016, unless the County Council enforces action on riparian owners of watercourses where necessary and instigates a programme of drainage improvements. Conversely, while I'm not at all pretending that STNP7 is proposed for development primarily as a means to reduce existing flood risk, I do think that if such development is implemented in line with strong Plan policies, it offers the best chance there is of solving at least some of the existing problems.

I look forward to hearing any further views you may have.

Kind Regards,  
Chris

**ACTION TAKEN:**

**Comment 1:**

**RESPONDENT NUMBER: 2**

**DATE:**

29 June 2020

**Comment:**

Just wondered why The Chequers was not on your list of heritage housing. It's not listed because Breckland (Council) did not know it existed until we moved in, we know this because no one had ever paid rates until we asked why, yup, stupid move I agree. They wanted to list it then but we said no thanks.

It was built according to 'Shadows on the Summer Grass', circa 1740, and the road is named after the pub. It is also mention as the pub where the ordinary members of the village spent 10/- after the football match against Watton over the Wissey bridge.

We will be listing it before we eventually move to stop several building interested parties, from destroying the trees and building houses on the acre plot. Adding it to your list will also help stop this.



#### RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 6: Heritage Assets

#### REACTION TO REPRESENTATION(S):

The following response was sent on 6 July 2020:

Dear {name removed for confidentiality},

My group and I have discussed your suggestion to include 'Chequers' in the neighbourhood plan as a non-designated heritage asset.

Respectfully we feel that is not appropriate for the following reasons:

- We did not simply select buildings for inclusion at random, but reviewed each against selection criteria recommended by Historic England. While it is a subjective matter, we do not feel that "Chequers" meets enough of those criteria to qualify;
- A key part of the plan's policy for non-designated buildings is to preserve their setting for the benefit of villagers. National planning rules define setting as "the surroundings in which a heritage asset is experienced". In the case of 'Chequers' it is not "experienced" by villagers, since neither it nor most of the land surrounding it is visible from the roadside.

We have to be very careful about making additions to the Plan between now and when it is submitted. Too many and the Plan will be subject to challenge due to not allowing consultation on new items. This would be of small concern were it just the addition of 'Chequers', but you will hopefully understand that its inclusion would require further consideration of other buildings around the village that similarly have interest but are not publicly visible.



A key point is that the Plan can and does aim to protect village interests, while conversely planning rules – and I think ethics – do not allow it to protect individual's interests, even in such cases as yours where the aims are noble.

As individuals, the group fully supports what you aim to do with regard to safeguarding 'Chequers', but do not feel the Plan is the appropriate way to do that on a more formal level. But to offset any disappointment this may cause; I want to reassure you that your property is already protected in other ways:

Local Plan Policy ENV 08 says: "Proposals that could affect previously unrecognised heritage assets will be expected, through agreement with the Council, to undergo an appropriate assessment, proportionate to the significance of the asset." Clearly as we speak 'Chequers' is an unrecognised heritage asset (in formal terms) and so qualifies for Local Plan protection.

To back this up, Historic England's Advice Note 7 "Local Heritage Listing" notes: "However, the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified". Furthermore, and probably most importantly, there are two other protections:

- The Local Plan does not allow development remote from the settlement boundary, so development of your land would be refused on that basis;
- Other than new single buildings in the countryside for agricultural workers and sites made up entirely affordable housing, the Neighbourhood Plan does not allow any new housing other than that on the 9 allocated sites.

I am sure you know much more about the process for listing a building than I do, but I would also have thought if a building was in the process of being listed, that would have to be taken into account should it be subject to a planning application while that process was in progress.

I hope you will understand the reasons for our decision. We salute your intention to safeguard your house for the future, and wish you well in gaining listed status for 'Chequers'.

Thanks for your interest in the Plan.

**ACTION TAKEN:**

None required

**RESPONDENT NUMBER: 3**

**DATE:**

01 August 2020

**Comment:**

I feel that the plan under represents the value of and need for improved public access routes, ideally off road. There are references to improved walking and cycling routes but they are quite vague. Could there be an aspiration for an off-road or dedicated connection to Watton (via the golf course if development there materialised?) and to the Peddars Way. The possible provision of new greenspace off Richmond Road is great but again, how valuable it would be to provide links to it from other parts of the village and perhaps down to the Brandon Road. Footpath provision in the Parish is very poor and I feel that improving it should be a key part of the plan.

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

General

**REACTION TO REPRESENTATION(S):**

The Plan addressed just such an aspiration in its first Regulation 14 version, March 2018, based on community responses to initial questionnaires. Since it was an aspiration rather than a land development topic, it was included under "Parish Action Points". During the formal consultation on that version of the Plan, that action point received overwhelming parishioner support (93% in favour). Given the level of support for all the Parish Action Points, in October 2018 they were formally accepted by the Parish Council for implementation, and hence subsequently removed from the Plan.

For information the accepted action was worded as follows:  
Following further consultation with parishioners to establish a solution likely to be both practical and achievable, Saham Toney Parish Council and other elected representatives will work with the Highways Authority, Breckland District Council and others as appropriate, to seek to improve pedestrian routes through the village, particularly along eastern routes, and if feasible also across open country, particularly towards Watton. Among possible measures to implement this, the construction of pavements locally via conditions to planning permissions will be sought.

**ACTION TAKEN:**

None required

**RESPONDENT NUMBER: 4**

**DATE:**

09 August 2020

**Comment1:** Ref: - Proposed development of 6 houses at Terra Firma, Richmond Road. - close proximity to our historic church.

This would constitute an absolute backfill development and all those affected by this will object. My land borders this property on the total length of its western side, it is an elevated site and I am in no doubt that the topography of same will contribute to a considerable run off of water to my meadows which further to the south are the level of Saham Mere, and I would prefer to not have any further water placed here to contribute further to this area.

Richmond Road has become an extremely busy road, and to consider further vehicles accessing the highway from this site creates a dangerous situation, being between the two sharp bends. I would think that if this proposal ever reached Breckland, Highways would throw it out as being totally unsuitable.

**Comment 2:** Finally, a minor point, I am at a loss as to why you have considered it favourable to include sites –

Pages Lane/Chequers lane – whereby there will be somewhere about 50% of all potential sites proposed within a 100+ metres of each other. I question how effective your plan will be because you have I suppose no alternative but to include these as they are within the village boundary, So where are you in being sensitive to the needs of the village, these will happen without the village plan. In truth all you will accomplish is eliminating the odd development from someones large garden. I would rather see those than these larger developments totally eliminating those green spaces within the village.

**Comment 3:** I don't wish to be too disparaging because undoubtedly endless hours of work have been put into this, with best intentions and this I acknowledge.

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Comment 1: Policy 2O: Site Allocation STNP15

Comment 2: Policies 2H, 2J, 2K: Site Allocations STNP1, 4 and 7

Comment 3: General

**REACTION TO REPRESENTATION(S):**

**Comment 1:** The allocation of site STNP15 has been justified by a process of independent site assessments and an objective and analytical process of site selection. Policy 2O and the Plan in general include a range of requirements to ensure the site's development is acceptable, including with regard to flood risk, highway safety, the amenity of neighbouring properties and heritage impact to the Church. A professional transport study has shown that safe access to and from the site is achievable, and that the site, in combination with the other sites allocated, will have only negligible impact on road traffic and junction use. The study demonstrates that satisfactory visibility splays are available at the site with reference to both bends in Richmond Road mentioned in the comment.

It is respectfully pointed out that the Local Highways Authority does not have the power to 'throw out' planning applications, all decisions lie with the Local Planning Authority.

The Plan's policies on surface water management ensure that runoff rates and volumes will be no more than their pre-development values, so there is reason to expect considerable additional runoff to the south.

The comment does not present any evidence against allocating the site in question, though the commenter is of course at liberty to object to any future planning application.

**Comment 2:** None of the sites in the area noted (STNP1, 4 and 7) are within the settlement boundary, so the comment is inaccurate. As for comment 1, their allocation has been fully justified by a rigorous process of site assessment and selection and no valid reason is given to amend that

**Comment 3:** Noted

**ACTION TAKEN:**

**Comments 1-3:** None required

**RESPONDENT NUMBER: 5**

**DATE:**

12 August 2020

I am interested in reading the Neighbourhood Plan for Saham Toney, and have particular interest in the site that has been allocated (STNP14).

I would be grateful if you could confirm the actual site where the 5 homes have been allocated as there appears to be a discrepancy in the site plans that are available, and in turn, will have a significant impact on our property.

I have noticed on your website, under the main 'site allocations' page (<https://www.stnp2036.org/site-allocations.html>), the 5 homes are allocated to run alongside Hills Road, as shown in the picture below.



However, looking at the documents that listed under the third regulation 14 Consultation on the pre-submission plan ([stnp\\_site\\_selection\\_report\\_2nd\\_edition\\_may\\_2020.pdf](#)), the site allocation of the suggested 5 properties has moved to run alongside our property, as shown in the picture below.



I am very much hoping that this has been a mistake, but would be grateful if you could confirm as soon as possible as this will result in comments being made on the pre-submission plan by the required time (14 August).

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2A and 2N

Site Selection Report, 2<sup>nd</sup> Edition, Fig. 1

**REACTION TO REPRESENTATION(S):**

The configuration given in Policy Map 2A of the plan (the first illustration in the comment) is the correct one. That is further confirmed by Policy Map 2N, which concerns the site allocation itself. The alternative given in Figure 1 of the site selection report (the second illustration in the comment) was valid at the time sites were put forward to be considered for allocation, and remained valid when sites were

provisionally allocated (see Figure 11 of the Site Selection Report), However, it was subsequently amended in the Plan at the suggestion of a Breckland Council planning officer prior to the publication of the plan for consultation between August and October 2019. That change is noted in paragraph 15.4 of the Site Selection Report, and is shown in Figure 19 of that report. That is the version that has been carried forward into the Plan's policies.

Hence there is no need to amend either the Plan or the Site Selection Report.

**ACTION TAKEN:**

None required

**RESPONDENT NUMBER: 6**

**DATE:**

12 August 2020

**Comment:**

I am concerned that the 6 new dwellings planned for 8 Richmond Road is excessive for the size and location of the site and should be reduced in number due to the dangers of the Richmond Road. Most house-holds have a minimum of 1 car and very often 2 or 3. This would mean the daily comings and goings of perhaps 12 cars from the site onto an already very busy road, which surely raises safety concerns for all. It has been reported by the local Speedwatch Team in the village that Richmond Road regularly carries an average of 340 vehicles an hour – back in 2018. With other new developments on the Richmond Road i.e. Richmond Hall Richmond Road Saham Toney 5 houses, and also other new developments in Saham not to mention the large new development to be built behind Wayland Avenue off Richmond Road in Watton to consider. New residence will be wanting to use the Richmond Road at some point either to come into/through or out/through the village.

The entrance to the development at 8 Richmond Road, will be right opposite my kitchen window, where I spend 90% of my time. This means, especially in Winter months' the comings and goings will be quite invasive with car engine noise pulling away/slowing down. After dark headlights will shine into our private space and impact on our family life.

The houses intended for the site are for 1, 2 or 3-bedroom properties, that are affordable to younger villagers, has the potential impact to the school been taken into account?

We have already been subjected to the development expansions of SuBridge pet supplies. They work extensive shift hours. We often hear warehouse noise, ie fork lift trucks beeping their horns, lorries dropping off trailers ready for hitching. The lighting is polluting the night sky, it is very bright. When the lorries pass our home it literally blocks all our light out downstairs from the road. The lorries cannot get round the corner at the church on their side of the road and oncoming traffic is at risk and this includes the pedestrians walking along the pavement, which I have experienced first-hand with wing mirrors missing me by cms. At the moment if two lorries/farm traffic, one of the vehicles usually mount the curb or the pavement, as the road was not designed for the amount and type of traffic that is using it, without any more additional traffic joining it at this stretch of the road. There is also the problem of oncoming traffic in the middle of the road at the old post office corner, due to parked cars

What I am trying to say is, there is excessive traffic already passing along Richmond Road. With the potential new traffic from the new development at 8 Richmond Road joining the carriage way between two ninety-degree bends at each end of the proposed new site entrance, is a highly dangerous recipe. Sadly speeding cars hurtle past this stretch of road, although we are in a 30 mile an hour zone. One of my big concerns is a car being shunted into my house which is close to the road.

Lastly, I feel it's a great shame to knock down a very nice house which has a large garden backing onto open fields, this provides habitat to extensive wild life species, including birds, hedgehogs, owls and deer etc etc. Building over the garden would have a detrimental effect on the local wildlife.



We feel that any additional building to the site can only detrimental to the existing residents.

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policy 2O

**REACTION TO REPRESENTATION(S):**

The Saham Toney Transport Study (AECOM, April 2020) assessed the potential traffic impact of site STNP 15 (8 Richmond Road) along with 10 other sites that at the time delivered a total of 83 new dwellings (two sites were subsequently removed from the Plan, reducing the total to 70 dwellings). The study paid particular attention to the road junction between Richmond Road and Pound Hill, about 80m from the proposed access point for the site. As part of the study a village traffic survey was carried out, and included measurements taken at that junction. That survey established the weekday peak hour two-way traffic flows. For the junction in question the maximum hourly flow was 210 vehicles with an 85<sup>th</sup> percentile speed of 33.8 mph, during the 9-10 am peak. The study recommended 59m long visibility splays in either direction from the site access point, and that requirement has been implemented in Policy 2F. The study identified that safe access to and from the site is achievable, and provided an indicative drawing of such access, which is included as Policy Map 2F.8 of the Plan. Using standard methodology, the study estimated the site will generate an additional 5 vehicular trips at peak periods. The study examined collision data and concluded there was no evidence that the development would exacerbate any existing road safety concerns.

The study also concluded that the development will have no discernible impact on the capacity at the nearby junction, which currently operates well within its capacity.

The overall conclusion of the study was that the allocated sites can be accommodated without detriment to the local highway network.

It is respectfully noted with some irony that the access to the reviewer's property is virtually opposite the existing dwelling at site STNP15, and is not deemed to cause a nuisance in terms of headlight intrusion for example.

The Neighbourhood Plan cannot dictate school places, that is the responsibility of Norfolk County Council. However, Policy 1 does require this to be taken into account as far as is possible, by virtue of stipulating a need for adequate social infrastructure to accompany development.

The consequences of expansion of facilities at Su-Bridge do not result from development of STNP15, nor are they a valid reason not to allocate STNP15. Likewise, disturbance the respondent experiences by traffic passing a property sited directly at the roadside.

All development will be likely to have some impact on local wildlife, but Policies 7D, 7E and 7F provide suitable protections in this respect.

In summary the points raised do not justify the removal of site STNP15 from allocation in the Plan.

**ACTION TAKEN:**

None required

**RESPONDENT NUMBER: 7**

**DATE:**

12 August 2020

**Comment 1:** The first comment is that the website for the Plan makes it much easier to submit an approval on the Plan. It takes more searching to make comments which might oppose various parts of the Plan.

**Comment 2:** We object in particular to the proposed inclusion of the site at 8 Richmond Road as a redevelopment site. The initial proposal has moved from building two new houses on the site to six, comprising what can only be a small estate in a heritage sensitive site. This is the centre and the heart of the historic Saham Toney.

**Comment 3:** The plot is sandwiched between the historically important Alms-houses and the Church Cottages. We take issue that the Church Cottages were not included as being of historic interest. They were built by the Church in the 1850s to house members serving the Church and Parish and predate

many other dwellings in the village. We suggest that the Plan be updated to reflect their historic and heritage importance. The two-way access road will run beside the Alms-houses. This planned estate road leading into Richmond Road will be incongruous and break the natural line of buildings. It will also impinge on one of the valued and identified (in your plan) views to be preserved facing East along Richmond Road to the Church Green and St George's.

**Comment 4:** The site is within view of a Grade I listed building, St George's Church. It is also directly opposite the Old Rectory, a Grade II listed building and one of the most important historic houses in the village.

**Comment 5:** I trust that should planning permission be sought it will be heavily opposed on the heritage aspect when it goes before the Breckland Planning Committee. We believe it would be better for Saham Toney for this plot to be excluded from those identified as suitable in the Plan. It will be yet another dreadful planning blight on the village.

**Comment 6:** We plan to include Breckland Council in our comments.

#### RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 20

Policy 6

Policy 7B

#### REACTION TO REPRESENTATION(S):

**Comment 1:** Comment not accepted and strongly refuted. During consultation, the home page of the STNP website had a simple form for those who wished to support the Plan without making comments. It also had a direct and prominent link to the consultation page where there is an online form for those wishing to make comments, either in support of, or opposition to the Plan, together with a downloadable version of that form in both Word and pdf formats. See screen shot below:

The screenshot shows a web browser window with the address bar displaying 'Regulation 14 (3) Consultation Ju' and a plus sign. The page URL is 'ation-14-3-consultation-june-2020.html'. The navigation menu includes 'HOME', 'DOCUMENTS', 'CONSULTATIONS', 'SITE ALLOCATIONS', and 'MORE...'. A red 'HERE' link is present, followed by the text 'Details of online 'drop-in' meetings held during consultation may be found HERE'. Below this, a green message states: 'Although consultation is now closed, you can still show your support for the Plan by filling in your details below and clicking "I support the Plan"'. A note indicates that asterisks denote required fields. The form includes input boxes for 'Name' (split into 'First' and 'Last') and 'Email'. A black button with white text reads 'I support the Plan'. Below the button, a message states: 'The form below was available during the consultation, as one of several methods of submitting comments. It is now no longer accepting entries'. Further text mentions that comments were also invited by email or phone, and a paper copy was available on request. It also notes that the same form was provided in MS Word format and could be emailed to 'stnp2036@gmail.com'. At the bottom, there are two download links: 'reg\_14\_comments\_form\_instructions\_final.pdf' and 'reg\_14\_3\_\_consultation\_comments\_form.docx'. A large white box with a green border contains the text 'Regulation 14 Consultation Comments Form' and a note: 'This form will available during the Regulation 14 public consultation'.

It is clear that the facility to simply support the Plan had no more prominence than the comments form, and it took no more searching to find the latter than the former.

A link to that page was provided to all villagers in two issues of the village magazine (which is hand delivered to every household) and two issues of the local community newspaper, in a 4-page leaflet that was delivered to every household at the start of the consultation, in emails to all on the Plan's mailing list, and publicised on local community social media. In addition, a widely publicised 'hotline' number was open for 11 hours each weekday throughout the consultation period, for villagers to call for information on the Plan, advice on how to make comments, and if wished, to give comments.

Information on how to make comments was also given on posters and notices displayed around the parish. This comment is simply an ill-advised attempt to falsely discredit the consultation process and is unequivocally rejected.

**Comment 2:** The comment about proposed site size is inaccurate. Two options for the site were originally put forward by the owner: one for two dwellings, which the owner subsequently withdrew (meaning it could not be allocated); and the other for 4-8 dwellings. The 6 dwellings allocated cannot reasonably be considered 'an estate'. The site has undergone a process of independent site assessment and rigorous site selection, which both concluded the site is suitable for development, subject to meeting certain requirements, which are set out in Policies 2F and 2O, as well as in other relevant policies of the Plan. Policy 3A: Design and the Parish Design Guide sets out measures to ensure any development properly respects local character and the village vernacular.

**Comment 3:** The buildings included in Policy 6 as non-designated heritage assets were identified by an analytical process using criteria recommended by Historic England, as set out in the supporting document 'Reasoned Justification for Policy 6: Heritage Assets'. The age of a building was just one of eleven criteria considered, and is not in itself sufficient to warrant designation. It is also pointed out that the non-designated assets in the current version of Policy 6 are precisely the same as were in the first (March 2018) and second (August 2019) Regulation 14 versions of the Plan, and at neither of the consultations on those versions were additions or deletions from the list put forward for consideration. Circumstances have not changed since then, hence there is no justification to amend the list of non-designated assets. With regard to Key View 2, as given in Policy 7B, the supporting text to the policy notes "The aspect of value which make this a key view is related to the glimpses of the church tower experienced on the approach to the village and its role as a locally important landmark, aiding in orientation and signalling the village ahead". The allocated site, being on the opposite side of Richmond Road, does not play a significant part in that view, but nevertheless development of the site will be managed by the requirements of Policy 7B to preserve and incorporate a Key View, and future proposals may be judged in that light. No plans of an 'estate road' have been put forward, hence comment in this respect is considered speculative. There is no 'natural line' of buildings along this section of Richmond Road, since all dwellings are set back at different distances from the roadside. The site access road, for which again there are as yet no details to make valid comment on (those coming only when a planning application is submitted), will not in any case run beside the Alms houses: (a) because they do not directly adjoin the allocated site, and (b) because their setting is offered protection under Policies 3A and 6.

**Comment 4:** Policies 3A: Design and 6: Heritage Assets, ensure that any development must conserve the significance and setting of the two listed buildings noted, and that is further emphasised in the site allocation policy (2O). The same applies to the setting of the Alms Houses (Wisteria Cottage), which is a non-designated heritage asset under Policy 6.

**Comment 5:** A site allocation in the Plan is not the same thing as a planning application. The former sets requirements that the latter will be required to meet. Comment on the specific form the development may take can only be speculative at this stage, and it is stressed that the Plan's policies, together with the Local Plan and national policies, will not permit 'planning blight'.

**Comment 6:** Noted, and pointed out that regardless, Breckland Council automatically sees all comments in this Consultation Statement.

**Overall:** It is considered that the Plan's policies already include sufficient measures to address the concerns raised.

**ACTION TAKEN:**

None required

**RESPONDENT NUMBER: 8****DATE:**

14 August 2020

**Comment 1:** I would like to voice my strong objection to the proposed development of 8 Richmond Road (Site 15), which lies at the historic centre of the village of Saham Toney. The site currently has one house and the proposal seeks to replace this with up to 8 properties. This is incredibly inappropriate, as not only would this housing be of a high density, but it would irreversibly destroy the character of the village.

**Comment 2:** Given that the village plan states that it aims to protect the character and feel of the village, it makes no sense that this site would even be considered given that 8 Richmond Road is surrounded by historic buildings, many of which feature on your own heritage list (both listed and non-listed). First and foremost, this development will be situated directly opposite our historic church and the adjacent Old Rectory, and will do great harm to the setting of these handsome buildings. 8 Richmond Road is also directly adjacent to the old Alms Houses, which will be dwarfed by this development. My family's property, 10 Richmond Road is part of 2 cottages, the Church Cottages, built by the church almost 300 years ago. These cottages are as historic as any other building on the village's heritage list and they are older than some of these, too, but they are conspicuously absent. The well in the garden of 10 Richmond Road provided water for the church and the school for many years, and the church used the cottages to house visitors, including the schoolteacher. The two properties are thus part of the village's history. The development of 8 Richmond Road will see a high-density development of new houses right in the centre of these historic buildings. Although 8 Richmond Road itself is a relatively modern building, it is sufficiently set back from the road and of a sympathetic design that it does not damage the overall feel of the historic centre of the village.

**Comment 3:** From my personal perspective, I am highly concerned about the encroachment of properties up to the boundary of 10 Richmond Road. Due to the proposed high concentration of properties, it is inevitable that these would come right up to our boundary, resulting in properties overlooking ours. Indeed, loss to the flora at 8 Richmond Road would be damaging to our property's privacy, as well as the biodiversity we enjoy in our garden. Given that this proposed development is immediately next door, I am also angry that no specific notice was given to us as we would be directly affected. We should not have to go through the whole village plan to find reference to the site. Moreover, the development of the site was not clear, given that there were two proposed sites on the same land – a proposal for 2 dwellings and a proposal for up to 8. As a long-term resident of Saham Toney, growing up here, I feel that the proposal for Site 15 shows a complete lack of respect for residents and ignores the desire for village life, which I have enjoyed for so many years. This intensification of Saham Toney simply destroys the character and nature of a key part of the village. It is worth noting here that the website itself actively discourages objections by only providing an easy way to approve the plan and putting the option to add comments or objections below this. This was particularly difficult to identify on a mobile device.

**Comment 4:** I am also greatly concerned by the destruction of nature that would occur if this development were to go ahead. 8 Richmond Road has a good-sized garden that has many trees and a nature pond, providing habitats for a wide variety of wildlife. The property's rear boundary also backs onto farmland. Building up to 8 properties here would destroy these habitats and reduce the biodiversity of the village. Given local, national and global concerns relating to the destruction of natural habitats, these natural features must be preserved. A development of 8 properties, or any properties on this land for that matter, cannot avoid the destruction of nature and this cannot be accepted. Furthermore, the proximity to the fields is unsafe for development as the sheep in the field carry ticks which may be passed on to pets and humans.

**Comment 5:** Next, I am hugely concerned about the safety implications of this development. 8 Richmond Road sits on a relatively narrow stretch of road with two sharp bends at either end. 10 Richmond Road has been consistently denied a driveway because it is too unsafe, and your own independent assessors

have determined that access for 8 properties would be dangerous. The only way to mitigate this is to place a driveway at the boundary with the Alms Houses, which again would destroy the character of this property and the wider area. Furthermore, given that towards SuBridge there is another sharp bend and a very narrow road used extensively by HGVs, I am not convinced that access here would be any safer, particularly as 8 properties could have upwards of 16 cars, vans and other vehicles. Certain aspects of 10 Richmond Road also pose significant health and safety risks to the development that have not been considered, namely that our property has a septic tank that drains directly onto 8 Richmond Road, which lies at a lower elevation, and that we have an oil tank right by the property boundary, which would prevent any construction within a certain radius.

**Comment 6:** Lastly, I am concerned about the long-term implications of this development for the village. In addition to destroying the character and visual appeal of the village in an area with such a high concentration of old and historically-significant buildings, this development means a sudden densification of inhabitants, vehicles, pets, and not to mention construction work so close to the church and to the fields. The development would lead to an irrevocable loss of the quiet and tranquillity of the village and an increase in noise. 16 cars will be coming and going at all hours and upwards of 36 people will be housed on this site. This will be especially damaging for the church when services are being held, as well as for the elderly residents of nearby properties, such as in the Alms Houses, who have lived in the village for much of their lives and find themselves no longer welcome.

**Comment 7:** In sum, Site 15 is unsuitable for development and should be removed from consideration. At present, it has been admitted in your plan that it fails to meet multiple criteria, particularly with regards to access safety, and it remains on the list because it is hoped that you will be able to work around these criteria. However, it is self-evident that Site 15 will not ever meet these criteria and nor does it fit within your own policies for development. Taking all my objections together, I will summarise these points with direct reference to your own policies, providing additional comments and elaboration where necessary.

**Comment 8:** P1.1 While not mentioned up until now, there is not a sufficient number of school places for children from up to 8 additional households. Neither does Saham Toney have any current social infrastructure beyond the pub and community centre.

**Comment 9:** P1.2 Pedestrian walkways are highly limited here and largely unsafe for children. Due to the rural nature of the area, improvements cannot be made and the addition of pavements would actually destroy the rural character. Given the commitment to ensuring that there is no streetlighting, it is presently quite dangerous crossing the road and it would be even more so if there were additional houses, increasing the amount of foot traffic, especially children. Cycling is very dangerous around here due to narrow roads and sharp bends. Public transport is limited in the village with only 1 bus to Norwich per day, and it is a walk to the bus stop.

**Comment 10:** P2F.2 8 Richmond Road is home to a wide array of wildlife due to its large gardens with trees, hedgerows and pond, as well as its proximity to farmland. Any development of this site would be damaging, particularly to small species such as newts, whose population in the UK has been reduced to dangerously low levels.

**Comment 11:** P2F.3 It is not possible to mitigate the above damage, especially as there are no plans for public areas or parks. Small individual gardens with lawns would not replace the diversity of the existing gardens.

**Comment 12:** P2F.4 Given the biodiversity of the existing site and the property's existing solar panels, it will be very difficult for the development to improve the green infrastructure.

**Comment 13:** P2F.5 Highway visibility cannot be improved due to the sharp bends at either end of the road. Removing hedgerows may help this, but this is very damaging to the ecosystem. I am very concerned that the hedges to the front of the property will be removed by this development.

**Comment 14:** P2F.6 10 Richmond Road has a septic tank which drains directly onto 8 Richmond Road, which is at a lower elevation. This is unsanitary. I believe that the independent assessment included issues with Anglian Water infrastructure, too.

**Comment 15:** P20.1.2 Safe access to the site cannot be guaranteed as has already been stated in the independent assessment. The shared driveway could only be possible at the boundary with the Alms

Houses, which would damage the character and value of that property, and may necessitate the removal of hedgerows, which the plan promises to protect.

**Comment 16:** P20.1.3 It is not possible to mitigate the impact on the heritage setting of the church as the development is directly opposite the church tower and main entrance. Unless the development is hidden behind hedgerows and sufficiently set back from the road to reduce visual and noise disturbances, the church will suffer.

**Comment 17:** P20.1.4 I am concerned that the west hedgerows will be removed to enable the provision of a driveway. Given the importance of biodiversity, hedgerows around the whole property should be preserved. I would also like clarification and assurances that the east hedgerows will be retained along the full side of the site, ensuring that 10 Richmond Road retains its privacy. This should also include trees close to the boundary.

**Comment 18:** P20.1.5 This is not possible. Neighbouring properties including 10 Richmond Road will be adversely affected by the development, with upwards of 36 new neighbours and 12 vehicles accessing the site at all times of the day. At 10 Richmond Road, we also have access issues, such as being denied a driveway, and crossing the road from our property is incredibly dangerous. Adding to this traffic will only add to this danger. The Old Rectory, whose driveway is directly opposite 8 Richmond Road will also find it more difficult leaving their drive with the increase in traffic. Neighbouring properties will also find that their privacy is removed, with properties overlooking them. They will also lose natural views. From the garden of 10 Richmond Road, it is currently possible to see over the garden of 8 Richmond Road to the farmland beyond – this will be lost. Furthermore, all adjacent properties will fall in value due to the development of what is essentially an estate.

**Comment 19:** P3A.1 & P3A.2 The new properties will be totally out of keeping with the local area. The current dwelling at 8 Richmond Road is a brick house that is sympathetic to its surroundings, aided by large gardens separating it from its neighbours. As the historic centre of the village, the area is not characterised by a high concentration of houses each with good sized gardens and bordering agricultural land. The only exception to this is the small development on the other side of the church, which this plan acknowledges was a failure in design and construction. Furthermore, given the variety of building styles in this area (lump clay brick, the brickwork of the Alms Houses, the converted barns and of course the flint church), what is an appropriate style for houses here? Any properties built here will be concrete blocks with a single skin of brick cladding. They will certainly not have a natural lime plaster such as 10 Richmond Road. I would like to draw your attention to this point about local context: “Retain rural spaces between existing village settlement clusters to avoid their coalescence.” The surrounding properties are characterised by large gardens with the properties set back from the road (with the exception of the barn conversion). This is impossible to recreate in the proposed development of 6-8 properties.

**Comment 20:** P3A.3 As above – what is the local vernacular? I note that in the plan, while distinctive chimneys, quoins and so on are mentioned, there is no mention of traditional lime plastering or other materials characteristic of this area. The new builds will be incongruous with the area.

**Comment 21:** P3A.4 The proposed development will drastically encroach on existing countryside and integration is not possible. There are no opportunities to improve pedestrian or cycling provision. Extending the footway would mean the removal of verges and hedgerows, which would be an ecological disaster.

**Comment 22:** P3A.5 The development is completely insensitive to surrounding built forms and layouts, which are characterised by various traditional construction techniques and local materials as well as large spacing between properties. It is problematic that only developments above 2 stories are accompanied by an appraisal when a large development will have similar visual harm.

**Comment 23:** P3A.6 Due to the large number of trees and other natural features on the property at 8 Richmond Road, any development of the site will reduce the area of habitats. Due to the space required for houses, the remaining “green” space will be significantly less than what exists already. Furthermore, 8 Richmond Road already has clear and attractive boundary treatments that do not need altering. Key views will not be enhanced here. Approaching the area from SuBridge, the view across the fields will be ruined by the development.

**Comment 24:** P3A.7 Given the specific character of the area and the historic buildings, a development of multiple properties cannot have a positive impact on the local environment or the local community. Furthermore, safety is a major issue in this area and this site is not suitable for the development of multiple family homes.

**Comment 25:** P3A.8 This proposal ignores the significance of the historic environment, encroaching on multiple historic properties and adversely affecting the current setting of the property, which has large gardens overlooking fields. Furthermore, neighbouring buildings, all of which are hundreds of years old, will lose material value as they will lose the advantage of being in a rural area, no overlooking windows and full privacy. 10 Richmond Road will particularly suffer as it will not only find itself with up to 8 additional neighbours, which will surely reduce its value, but its value is already lower than it should be due to the unsafe nature of the road which prevents the building of a driveway.

**Comment 26:** P3A.10 The area is currently unsafe, with limited access to footways, infrequent public transport, and no amenities. Due to the rural character of the roads, footways cannot be added nor can existing footways be widened, which means that these properties will not be suitable for those with mobility issues. The high concentration of properties additionally raises concerns about safety during this current pandemic, as social distancing will be difficult on narrow paths and on a development where there is only one entry/exit.

**Comment 27:** P3B.1 The density of the proposed development at 8 Richmond Road does not maintain the prevailing character of the area. Saham Toney is quite diverse, with densities varying across the village. In this particular area, a large number of properties on less than half a hectare is completely inappropriate.

**Comment 28:** P3C.1 Due to the sharp bends at either end of the stretch of road, site access will impact highway safety, particularly as many HGVs and other vehicles use the village as a route to Swaffham, regularly ignoring the speed limit. The development will add a significant number of additional cars to the road, rising from 2 at the current property to upwards of 12. Traffic calming measures are not possible as this is at the edge of the village with speeds rising to 60mph. Only one pedestrian/vehicle access in and out of the site is possible, and even then it is possibly dangerous. Pavements are not possible, as stated above.

**Comment 29:** P3D.1 Parking is of great concern in terms of its contribution to the visual character of the area as there would be a large number of parked cars visible from the church. Due to the size of the plot, parking spaces would reduce the land available for gardens, which goes against the commitment to improving green spaces and biodiversity.

**Comment 30:** P3E.1 I am highly concerned that a development of multiple properties would necessitate streetlighting, which is out of character with the area, particularly in the historic centre and this close to farmland. Light will unavoidably spill into neighbouring properties, which currently enjoy good views of dark skies. Streetlighting would also be damaging for wildlife, particularly the sheep on the farmland and the animals in the hedgerows and trees.

**Comment 31:** P6 8 Richmond Road is surrounded by heritage assets and the development of 6-8 properties will have a detrimental effect on these.

**Comment 32:** P7A.1 The development will see the removal of the biodiversity of the existing gardens.

**Comment 33:** P7A.2 Spacing between properties will be reduced.

**Comment 34:** P7A.3 This development will badly affect the rural and village characters of Saham Toney and are not sensitive to the existing landscape.

**Comment 35:** P7A.4 A distinguishing feature of this part of the village is the low density of housing marked by large gardens either side of properties. This will be lost.

**Comment 36:** P7A.5 8 Richmond Road backs directly onto farmland, which should be avoided. The property also boasts a number of features that should be protected, but cannot be if development goes ahead.

**Comment 37:** P7A.6 The setting and views of this area have been overlooked in the plan and will be damaged by the dense development of the site.

**Comment 38:** P7A.7 As the site falls outside the centre of the “modern” village (as opposed to the historic centre around the church), it is essential that the area retains its rural character and aesthetic. This is not possible with such a large development.

**Comment 39:** P7B.1 The site falls on Key View 2, which is defined by countryside views, hedgerows and a small number of old houses of historic value and a limited number of “new” properties (the new barn and 8 Richmond Road in its current form). The development of 8 Richmond Road will have a significant impact on this view and will badly damage the village’s character.

**Comment 40:** P7C.1 The sites designated as local green spaces are highly limiting and, in my opinion, misleading. While these may benefit biodiversity, many of these spaces are not accessible to the public. While this policy refers to preventing their development, other parts of the plan refer to the provision of green spaces for the enjoyment of residents. Saham Mere is private, and the churchyard is not an open space to be enjoyed. Neither site could be developed due to the limitations of the sites, and their inclusion detracts from other green spaces that should be preserved. 8 Richmond Road has a large amount of biodiversity in its current gardens that would be lost, and the development would be detrimental to surrounding farmland.

**Comment 41:** P7D.1 Due to the density of the proposed development at 8 Richmond Road, it would not be possible to recreate the same level of biodiversity and it would definitely be possible to enhance it. Furthermore, any development would need to ensure that only native plants are used in order to best promote native wildlife, especially insects. Such flora is already well-established and its removal would disturb extant habitats.

**Comment 42:** P7D.2 For the above reason, this will be a net loss of biodiversity, which is not permitted. The loss of areas with water in particular will have a devastating impact on species like frogs and newts, which would not be recreated in any development.

**Comment 43:** P7D.5 The hedgerows were planted to provide a habitat and network for hedgehogs. Even if hedgerows were retained, any fencing would be highly damaging to hedgehogs, which are in great abundance in the area. The natural style of the gardens of 8 Richmond Road cannot be retained if 6-8 houses are to be put in their place. Thus, this is against your policy of “improv[ing] the naturalness of green spaces and access to them”. Indeed, the use of fences and other partitioning structures except for natural hedgerows would reduce existing connective between spaces and damage wildlife.

**Comment 44:** P7D.6 Due to the high abundance of biodiversity through the large gardens, it will be impossible to restore biodiversity once houses are constructed. This loss cannot be avoided either. Furthermore, where will this offsetting take place?

**Comment 45:** P7D.7 8 Richmond Road has large gardens which are undeveloped but have a large amount of flora, including trees and hedges, which benefit the local ecosystem. According to your policy, such spaces should be preserved, but this would not be possible for a development of 6-8 houses.

**Comment 46:** P7E.1 This property already has solar panels and its gardens are used to grow a variety of native fruits and vegetables for the owners. There would be no net gain in its development.

**Comment 47:** P7E.4 Due to the high density of housing, soft landscaping cannot be incorporated.

**Comment 48:** P7E.5 Similarly, due to the high density, the site will lose a well-established nature pond and it will not be possible to replace this with “small water bodies”. Even if one or two were possible, this would not make up for the loss of habitat and biodiversity.

**Comment 49:** P7F.2 While the site only has tree preservation orders on its 2 of its trees, its trees and hedgerows are long established and provide homes to numerous birds, animals and insects. Its loss would be catastrophic. Your own plan says that developments which include additional planting of flora would be supported – this development will result in a net loss.

**Comment 50:** P7F.3 A full inspection of the flora at 8 Richmond Road should be carried out to confirm the above points. If any of these are lost, it will not be possible to “enhance the landscape”, but only destroy it.

**Comment 51:** P7F.4 What is an appropriate level of new tree and hedge planting? You have already stated that you intend to remove hedgerows, and the building of 6-8 houses will necessitate the removal of trees.



**Comment 52:** P7F.5 Due to the density of the proposal, the protection of trees and hedgerows, particularly given that they are long established and have long roots, will be very difficult.

**Comment 53:** P8C.1 & P8E While not an issue of surface water discharge, 10 Richmond Road's septic tank drains onto the land of 8 Richmond Road, which significantly reduces the acceptable area for building.

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2F, 2O and 6 specifically and various individual policies as noted in the comments

**REACTION TO REPRESENTATION(S):**

**General:** It is respectfully noted that the respondent has not understood that a site allocation in a neighbourhood plan is not a planning application, and is not required to present the level of detail that must accompany the latter. It is hence invalid to make guesses or to speculate as to what form a planning proposal might take, and then use that as a means to support an objection to a site allocation. What can be said with certainty is that any future planning application will be required to comply with the Plan's policies.

The Plan's Site Assessment and Site Selection Reports have shown the site to be 'suitable for development' and demonstrated that factors that initially were constraints on the site's development may be adequately mitigated. In order to ensure that, specific requirements for the development of the site have been given in Policy 2O, together with common requirements in Policy 2F, together with many other applicable criteria throughout the Plan's policies.

It is noted that many of the comments contain inaccuracies and misconceptions, which are addressed in the specific responses.

**Comment 1:** The proposal is for 6 dwellings not 8. The site density has not only not been challenged by planning officers; in fact, they have challenged the density as potentially being too low, as has an independent examiner who completed a 'health check' of the Plan in July 2020.

**Comment 2:** The site allocation policy, 2O, together with policies 3A and 6 require that the significance and setting of heritage assets be conserved and respected, and any future planning application will need to address the requirements of those policies in this respect. Although Historic England has made an objection to this site, its response notes that any potential impact to the setting of nearby listed buildings will 'be relatively low'. Given that, like the applicant, it is not commenting on a detailed planning application, it lacks information to justify that comment, which has therefore not been accepted. The historic environment officers at Norfolk County Council and Breckland Council have raised no objections to the site. See reaction to respondent 7, comment 3 with regard to the Church cottages and their lack of designation as heritage assets. Also, the Strategic Environmental Assessment raised no concerns about the site with respect to heritage impact.

**Comment 3:** The Plan does not include a site plan, so there is no basis for the supposition that new development will 'inevitably come up to the boundary of the neighbouring property. The Plan's criterion for residential amenity (Policy 3A) and building control regulations would both preclude that. Local Planning Authorities are required to inform neighbours of planning applications; neighbourhood plan groups do not have an equivalent obligation. That notwithstanding, the location of sites allocated in the Plan has been widely publicised over an 18-month period, in both paper and online form. This included an information leaflet delivered to every household in August 2019 which included a clear map of the allocated site locations, which the respondent as a long-term resident would have been seen. That map can be found on the Plan's website and is specifically linked to in the Plan's contents list, meaning it is unnecessary to read the whole Plan to find it.

The 2 and 8-dwelling options mentioned in the comment were two alternate proposals put forward by the landowner in response to a call for sites. Neither option is included in its original form in the Plan itself, though both are, of necessity, mentioned in the site assessment and selection reports. Those documents concluded that a 6-dwelling allocation was suitable and appropriate and that is the only option that has appeared in the Plan, in both the second and third Regulation 14 versions.

It is strongly refuted that the Plan's website, or the work group, in any way "actively discourages objections"! To base such a claim on the fact that an option to simply support the Plan without comment is above a form to provide comments (be they in support or objections) is spurious. It was also possible

to comment by phone or to request delivery and collection of a paper comments form, or to simply send an email without using the comments form. All such options were made clear in an information leaflet delivered to every household at the start of the consultation and on posters and notices displayed around the village. Additionally, on many occasions neighbourhood plan articles in the monthly Parish magazine have stressed that STNP welcomes constructive criticism and negative comments on the Plan.

**Comment 4:** All development to a certain extent impacts on a nature. Site STNP15 is not more or less sensitive than any other allocated site in this respect, and the Plan's policies offer appropriate protections and any impacts must be fully considered at the planning application stage. The site has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments to be acceptable in terms of environmental impacts. It is again noted the site is for 6 dwellings not 8.

**Comment 5:** Refer to the reaction to the comments of respondent 6 and to the Saham Toney Transport Study, in respect to highway safety.

**Comment 6:** The comments made are almost entirely based on speculation about the details of a future planning application and are therefore not valid with regard to the Neighbourhood Plan, but it is recommended the respondent revisits them as and when a future planning application is submitted. The Neighbourhood Plan's policies provide a rigorous framework to prevent the negative affects the respondent, without evidence, presumes will occur.

**Comment 7:** STNP 15 has been shown by a robust, objective and analytical site assessment and selection to be suitable for development. By contrast the respondent's conclusion is based on pure speculation about the details of a future planning application, and an emotional response to development 'in their backyard'. Site STNP15 has been included in two formal Regulation 14 publications of the Plan and has attracted no comments from Breckland Council planning officers, heritage specialists or Natural England. Furthermore, it has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments that it is acceptable in terms of environmental impacts

**Comments 8 – 53, general:** The policies of the Neighbourhood Plan set out requirements with which any future planning application for the site must demonstrate compliance in order to be permitted. Those requirements are in part required to overcome constraints on the site identified by the 4 independent site assessments, and in that regard are explained and justified in the Site Selection Report. It is completely inappropriate to interpret those policies with respect to uninformed, unfounded and highly speculative suggestions as to the detailed proposals that may be made at the planning application stage, and to then conclude on that basis the site fails to meet many of the Plan's policies. Each policy comment is individually addressed below.

**Comment 8:** It is again noted the site is for 6 dwellings not 8. School places are the responsibility of Norfolk County Council and are not a matter for a neighbourhood plan. The County Council has made no objections with regard to this, or any allocated site, and school places. A future planning application will be required to consider the availability of infrastructure with reference to Policy 1, but it is pointed out that limited (as opposed to inadequate) existing infrastructure is not on its own a reason to deem a site unsuitable for development.

**Comment 9:** While the comment is valid for many parts of the village, in the case of STNP15, it benefits from footway access to neighbouring Watton, to the pub, hotel and community centre, and to the primary school. Development of a single site cannot directly address cycling or public transport provision.

**Comments 10 and 11:** Any future planning application must include a satisfactory ecological appraisal. Furthermore, it has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments that it is acceptable in terms of potential environmental impacts.

**Comment 12:** See reaction to comments 10 and 11. Also solar panels on the existing property are irrelevant, since that dwelling is to be demolished as part of the development of the site.

**Comment 13:** The Transport Study concluded that adequate visibility splays can be achieved in both directions, as shown on Policy Map 2F.8. That map shows there is no requirement to remove hedges from neighbouring properties in order to create the required visibility.

**Comment 14:** This would appear to be a matter for the owner of 10 Richmond Road to address rather than a developer of site STNP15. It is presumed that only clean water drains from the septic tank rather

than sewage; if not the respondent is putting other people's health at risk and should take steps to rectify that. Anglian Water's independent site assessment did not identify any infrastructure issues specific to site STNP15.

**Comment 15:** This assertion is incorrect and invalid. While the independent site assessment raised a concern about the ability to provide safe access, it did not conclude that made the site unsuitable for development, and the issue has subsequently been addressed in the site selection report and the Transport Study.

**Comment 16:** Policy 20 requires the submission of a Heritage Statement with any future planning application, and that will address this concern. Until then, it is premature and unfounded to conclude there will be heritage impact, and not a valid reason to remove the site from allocation. Although Historic England has objected to the site, it actually has no justification to do so, since like the respondent it can only speculate about the details of a future planning application, and admits that any potential impact will be 'at a relatively low level'. The historic environment officers of the County and District Councils have raised no concerns in this regard. The Strategic Environmental Assessment of the Plan concludes development of site STNP15 may be implemented in a way that will not lead to harmful impact on the setting of heritage assets, providing it adheres to STNP policy criteria, which it must do in order to gain permission.

**Comment 17:** While a short length of hedge will be removed to form a site access, there will be an equivalent opportunity to infill the present site access with natural planting to offset the loss. In general trees and hedges are offered appropriate protection in Policy 7F. Policy Map 2F.8 confirms there is no requirement to remove the hedges to neighbouring properties in order to create the required visibility.

**Comment 18:** The likely numbers of new residents quoted is supposition, but six 1-, 2- and 3- bedroom properties are highly unlikely to result in 36 new residents. The plan shows to a necessary level of detail that the provision of safe access is achievable. More detailed drawings will address the fine detail of that when a future planning application is submitted. No-one is entitled to a private view, and in any case the only view neighbours will lose is that of the private garden at site STNP15. 6 houses cannot be considered 'an estate' and comment on property values is pure speculation. The Transport Study concludes that the site will generate a maximum of 5 additional vehicular trips at peak times, rather than the 12 supposed by the respondent.

**Comments 19 and 20:** Since the Plan presents no designs for the dwellings on any allocated site, this comment is entirely speculative and invalid. It will be the responsibility of a future developer to establish acceptable designs that respect local character and present them in a future planning application, and for planning officers to decide the application. Policy 3A and the Parish Design Guide set a suitably robust but flexible framework in which to do that. 21<sup>st</sup> century development at the nearby Church Barns shows that that design that is sympathetic and in keeping with local character can be readily achieved. In response to a comment from Historic England a new criterion has been added to Policy 20 with respect to design as follows: "Design shall pay particular attention to the historic character of the immediately surrounding area and fully respect its sensitive nature."

**Comment 21:** The development will be entirely within the boundary of an existing private residence and hence will not encroach on the countryside at all. It is not obligatory for every site to improve pedestrian or cycling provision, only where opportunities occur. Site STNP15 is already served by a pedestrian footway. Hedges are suitably protected by Policy 7F.

**Comment 22:** Since it is not the purpose of a site allocation policy to put forward specific design proposals, the comment is speculative and invalid.

**Comment 23:** See reaction to comments 7, 10 and 11.

**Comment 24:** As with other similar comments, this is largely a matter for a future planning application. The provision of new housing is recognised as offering social benefits to a community. If by safety the comment refers to highway safety see reaction to earlier comments on that topic. If it refers to general public safety that is not recognised as an issue in Saham Toney.

**Comment 25:** There is no planning requirement to protect the setting of an existing property (that has no heritage characteristics) when developing a site and that will in any case be demolished as part of the development. Regarding the historic environment, see reaction to comments 2 and 16. Comments on

the value of neighbouring properties are speculative and not an issue for the Plan as they do not relate to the use of land. The inability to create a driveway at a neighbouring property is not a result of the site allocation, and has no bearing on its suitability for development.

**Comment 26:** The site is well served by footways and none need to be added to serve it. Reference to social distancing being compromised by the addition of 6 dwellings is spurious, emotional and invalid.

**Comment 27:** Parker's Close, within a short distance of the site, has a higher density. See also reaction to comment 1.

**Comment 28:** See reaction to comments 5, 13, 15 and 18. The 85<sup>th</sup> percentile speed professionally measured by a survey as part of the Transport Study was 33.7 mph. It did not record speeds even approaching 60mph and there is no evidence that such speeds occur, but in any case, that is unlikely given the two right-angle bends in the near vicinity of this relatively short straight section of Richmond Road.

**Comment 29:** Visibility of parked cars from the church is not a planning issue and not a valid comment. Furthermore, it is just as likely that garage parking will be provided as on-drive. Provisions to improve green spaces and biodiversity in the Plan are qualified by 'where opportunities exist' rather than being obligatory for every site.

**Comment 30:** Policy 3E goes as far as is possible in a plan to prevent the introduction of streetlighting on any site, although it has been deemed unacceptable by planning reviews to outrightly ban it. All the same the policy inhibits intrusive light in cases where lighting is necessary. Again, this comment speculates on a future planning application which is not a valid reason for deeming the site unsuitable for allocation.

**Comment 31:** See reactions to comments 2 and 16.

**Comment 32:** See reaction to comments 10, 11 and 17.

**Comment 33:** This site is an infill development within the settlement boundary and the landscape preservation policy quoted does not deal with the spaces between individual dwellings, but rather the preservation of gaps between individual settlements

**Comment 34:** The Landscape Character Assessment makes no conclusions to support this comment. Actual impact, if any is a matter for a future planning application, rather than a speculative comment on the site allocation.

**Comment 35:** See reaction to comment 1 and 27.

**Comment 36:** No policy in either the Neighbourhood or Local Plans or in national planning policy, precludes development backing onto farmland. The Plan requires site design to take opportunities to blend in with the landscape and that will be a matter for a future planning application.

**Comment 37:** See reaction to previous comments on heritage and to comments 18 and 39 with regard to views.

**Comment 38:** As noted elsewhere the proposed development is not large. The comment speculates on a future planning application and so is invalid in that respect.

**Comment 39:** The site is on the very periphery of Key View 2, but the focus of that view is noted in Policy 7B of the Plan as being glimpses of the Church Tower from Cressingham Lane and that part of Richmond Road that lies to the west of the Church. The site does not impinge on that.

**Comment 40:** Local Green Spaces have been assessed and designated in strict accordance with national planning policy. STNP15 has no detrimental effect on farmland as it consists entirely of land that forms a residential garden. See reaction to earlier comments on biodiversity.

**Comments 41-46:** See reaction to earlier comments on density and biodiversity. The site allocation does not specify any loss of areas with water and it is unclear what the respondent is referring to in this respect. Again, the comment speculates on a future planning application. Biodiversity offsetting is a 'last resort' to offset losses if that cannot be achieved on a site itself. Its provision and location would be a matter for the local planning authority and a developer to agree when a future planning application is considered.

**Comment 47:** Any future development will not consist of entirely hard surfaces, so soft landscaping is feasible, but its details are a matter for a future planning application.

**Comment 48:** This comment is speculative and is invalid until a future planning application is considered.

<p><b>Comments 49-52:</b> Again, this is a speculative comment in respect of the impact of future development. Policy 7F protects trees and hedges to the extent possible under planning rules. The Plan does not in any way dictate the removal of hedges, quite the opposite.</p> <p><b>Comment 53:</b> This appears to be an issue for the owner of the neighbouring property to address the potentially insanitary issue that property gives rise to, rather than a reason not to allocate site STNP15.</p>
<p><b>ACTION TAKEN:</b></p> <p>None justified by the comments as explained in the reactions to them. No action taken</p>

<p><b>RESPONDENT NUMBER: 9</b></p>	<p><b>DATE:</b></p> <p>14 August 2020</p>
<p><b>Comment 1:</b> I was born in Norfolk and have lived in Saham Toney for the last 18 years and raised my family here and have considered it my home, where I had planned to live for the rest of my life. Whilst I appreciate and support the importance of a Neighbourhood Village Plan and the need to provide appropriate and affordable housing options allowing the village to grow and develop, I believe that these plans should be proportionate, sympathetic and should enhance the character and nature of both the village, its history and its wildlife. Therefore, I was very upset and disappointed to read the development plans for 8 Richmond Road (STP 11 &amp; 15) as I feel strongly that these do not meet any of those criteria and therefore strongly object to the proposed development. As a result of these plans I feel that myself and my family are being driven from our home by the greed of those whose incentive is to sell their property for profit without consideration to the impact on their neighbours. In all truth they have not even had the courtesy to discuss their decision with their immediate neighbours.</p> <p><b>Comment 2:</b> From my personal perspective, I am highly concerned about the encroachment of properties up to the boundary of my property. Given that this proposed development is immediately next door, I am also angry that no specific notice was given to us as we would be directly affected. We should not have to go through the whole village plan to find reference to the site. Moreover, the development of the site was not clear, given that there were two proposed sites on the same land – a proposal for 2 dwellings and a proposal for up to 8. This has also proven extremely difficult for elderly neighbours who do not have access to the internet and would not have known anything about this development or had the opportunity to object to it at this stage in the consultation if they had not been alerted by younger neighbours. This feels at the very least, an oversight, but to the more cynical appears almost dishonest as it allows the plan to proceed without a high level of objection. The website design itself is difficult to access on anything other than a computer and is difficult and frequently impossible to access properly on android devices, phones, ipads etc, it is poorly designed making it difficult to locate information or key documents. The way it presents the information is biased in that it only provides a clear opportunity to approve of the plan and to lodge any complaints or objection requires the download of a word document or the completion of a Google form – both of which are so well concealed on the website that they are nigh on impossible to find.</p> <p><b>Comment 3:</b> I bought my property adjacent to existing houses with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6-8 houses to be built on this site bordering my property. This will change the nature of my home completely. Even up until earlier this year I was assured by the owners of 8 Richmond Road that any future development plans were only for one property and even offering me the opportunity to have a right of way across the land to access a driveway for my property if they decided to develop this one property and gained planning permission, to then discovering that the plans are actually for 6-8 properties is causing me undue stress and anxiety. I work in a highly stressful environment dealing with safeguarding of children and special educational needs and my home has always been my haven from the stresses associated with this job. I now feel that this is being ripped away from for someone to make an exorbitant profit at the expense of their neighbours.</p>	

**Comment 4:** I was aware that when 8 Richmond Road was originally built that the plot next to it, adjacent to my house, had outline planning permission for one property. The previous owner of 8 Richmond Road (Mr [REDACTED]) had specifically bought this plot when he purchased his home to avoid this site being developed. In order to fit 6-8 houses on this relatively small plot, including the necessary access road, parking etc, it will mean that the properties will have to be built close to and all along the boundary of my property. As a consequence, my current views of fields, trees and sky will be obliterated by brick walls which will have a significantly negative impact on my quality of life and wellbeing. The peace and quiet of my garden with its birdsong, sheep noises, bees buzzing etc will be obliterated by the noise of cars accessing the site and 6-8 households.

**Comment 5:** When [REDACTED] inhabited the house, [REDACTED] was a keen amateur gardener and attended many courses to learn how to develop her garden to be rich in and sustain wildlife. The garden was planted with trees, shrubs and plants to support wildlife and together with the neighbouring gardens we have worked to create a corner of Saham Toney that is rich in birds, pond life and other wildlife. A prime example of this is that together with Mr [REDACTED] and our other neighbour we planted native hawthorn hedging on our properties. This has encouraged a range of wildlife and houses nests for many species of birds, but also provides habitats for other wildlife such as shrews, voles, mice etc as well as hedgehogs allowing them to travel across the boundaries of our properties. Consequently, there has always been a thriving population of hedgehogs in our gardens. Hedgehogs travel up to 3km a night, and whilst not territorial, follow a regular routine, visit the same gardens and same areas and appear to follow a routine according to research. Hedgehogs have now been identified as vulnerable to extinction for the precise reason of developments such as the proposed development of 8 Richmond Road. If this were to be built there is no doubt that it would have a significant impact on the local hedgehog population. <https://www.openaccessgovernment.org/british-hedgehogs-vulnerable-to-extinction/91551/>

Along with hedgehogs the gardens are also home to thriving populations of other endangered native British wildlife including bats, voles, harvest mice, reptiles and amphibians as well as native British fungi, fauna and flora; all of which would be significantly negatively impacted by this development. See following reports <https://www.theguardian.com/environment/2019/oct/03/populations-of-uks-most-important-wildlife-have-plummeted-since-1970> and <https://www.theguardian.com/environment/2020/jul/30/quarter-of-native-uk-mammals-at-imminent-risk-of-extinction> Many of these are already considered endangered. Both in our garden and at 8 Richmond Road there are wildlife ponds that support a diversity of native pond life which travel between the two ponds including newts, water boat men, frogs, toads, water snails and dragon flies – to name a few of the many species that are regularly found in our gardens.

Through careful planting of insect and bee friendly plants, native flora, fauna and trees, these gardens have increased biodiversity and there are healthy insect and bee populations. This in its turn supports the bird population and within both the gardens of numbers 8 and 10 Richmond Road a number of species regularly build nests in the trees, hedgerows and bird boxes. Regular visitors in the gardens include a wide range of tits, finches, blackbirds, thrushes, starlings, swifts etc including endangered species such as gold crests and both lesser and greater spotted woodpeckers. The development of 8 Richmond Road would have a significantly negative impact on these birds.

**Comment 6:** The village plan states that it aims to protect the character and feel of the village, and therefore it makes no sense that this site would even be considered given that 8 Richmond Road is surrounded by historic buildings, many of which feature on your own heritage list (both listed and non-listed). First and foremost, this development will be situated directly opposite a Grade 1 Listed church, St George's, and the adjacent Grade II Listed Old Rectory, and will do great harm to the setting of these handsome buildings. 8 Richmond Road is also directly adjacent to the old Alms Houses, a recognised Heritage asset, which will be dwarfed by this development. My property, 10 Richmond Road, formerly known as 2 Church Cottages is one of two cottages, the Church Cottages, built by the church circa 1850-60. These cottages are as historic as any other building, more so than many, on the village's heritage list and they are older than some of these, too, but they are conspicuously absent. These cottages should

also be considered a heritage asset due to their architectural features and traditional Norfolk lump clay construction with a lime plaster render.

The cottages were built to house members of the church staff and clergy, including at various times: the verger, the church warden, the curate and the Rectory housekeeper and maid. Prior to the building of the school house, the school teacher lodged in my cottage living in the largest bedroom in the house as befitting her status. The well in the garden of 10 Richmond Road (2 Church Cottages) provided water for the church and the school for many years and army divers discovered that it leads to the same underground lake that feeds Saham Mere. Therefore, in my opinion these buildings constitute an important part of the village's history and their nature and environment should be preserved. The development of 8 Richmond Road will see a high-density development of new houses not only alongside, but at the centre of these historic buildings. Although 8 Richmond Road itself is a relatively modern building, it is sufficiently set back from the road and of a sympathetic design that it does not damage the overall feel of the historic centre of the village and additionally has a well in the garden which promotes the aesthetic.

**Comment 7:** I am extremely concerned about the safety implications of this development. 8 Richmond Road sits on a relatively narrow stretch of road with two sharp bends at either end. Over the last 18 years we have been consistently denied a driveway because it is too unsafe, in fact the exact words of the assessor from highways were that it would only happen over his dead body. The independent assessors have also determined that access for 8 properties would be dangerous. They have identified that the only way to mitigate this is to place a driveway at the boundary with the Alms Houses, which again would destroy the character of this property and the wider area. The fact that there is a oak tree with a preservation order on it in the way of where an access road should additionally be considered as even placing it close to the tree would have a highly detrimental effect. Furthermore, given that towards SuBridge there is another sharp bend and a very narrow road used extensively by HGVs, I am not convinced that access here would be any safer, particularly as 8 properties could have upwards of 16 cars, vans and other vehicles as well as those required for services such as rubbish collection. Views from this access road will also be obstructed by any service or delivery vehicles at our property especially oil tankers delivering our heating oil, sewage collection from our septic tank etc. Due to the refusal to allow us a driveway we have spent 18 years navigating the dangers of crossing Richmond Road and can testify personally to its risk and danger. During our time in the property there have been multiple accidents on this stretch of road and we have narrowly avoided being hit ourselves on multiple occasions. Traffic does not travel at the speed limit and has increased hugely in its quantity over the last few years.

**Comment 8:** I believe there are additional elements that make this site unsuitable for development including a covenant that the previous owner included, but more importantly that there is drainage from my property which would impact on the development. As the land at 8 Richmond Road is on a slope along the boundary and at the rear end of the boundary of my garden there is a significant difference in height, with my garden being around 1 metre higher. Therefore, all excess water from my garden drains onto the neighbouring property. In the far corner of my garden, against the boundary to 8 Richmond Road, my septic tank is installed and the soak away field drains into the neighbouring property. Building regulations state that nothing can be built with 15 metres of a soakaway field. Additional to this we also have fuel tanks for heating oil against the boundary of the property. Building regulations state that these must be:

1.8m away from non-fire rated eaves of a **building**.

1.8m away from a non-fire rated **building** or structure (e.g. garden sheds)

1.8m away from openings (such as doors or windows) in a fire rated **building** or structure (e.g. brick **built house**/garage)

**Comment 9:** Finally, I am concerned about the long-term implications of this development for the village. In addition to destroying the character and visual appeal of the village in an area with such a high concentration of old and historically-significant buildings, this development means a sudden

densification of inhabitants, vehicles, pets, and not to mention construction work so close to the church and to the fields. The development would lead to an irrevocable loss of the quiet and tranquillity of the village and an increase in noise. At least 16 cars will be accessing the site. Their headlights will be impacting directly on the residents of Rectory Barns as they will be in line with their windows and upwards of 36 people will be housed on this site. This will be especially damaging for the church when services are being held, as well as for the residents of nearby properties, such as myself, my neighbour Mr [REDACTED], Mrs [REDACTED] in the Alms Houses and other residents, who have lived in the village for much of their lives and feel that they are finding themselves no longer welcome and effectively driven out of our homes.

**Comment 10:** In conclusion, 8 Richmond Road (STP 15) is unsuitable for development and should be removed from consideration. At present, it has been admitted in your plan that it fails to meet multiple criteria, particularly with regards to access safety, and it remains on the list because it is hoped that you will be able to work around these criteria. However, it is self-evident that it will never meet these criteria and nor does it fit within your own policies for development. To summarise please see below points which I have been raised in collaboration with other concerned residents, with direct reference to your own policies, providing additional comments and elaboration where necessary. We strongly feel that we are a community and that we will be addressing this as a community through a unified approach.

#### **Comments on Policy criteria:**

P1.1 While not mentioned up until now, there are insufficient number of school places for children from up to 8 additional households and the school does not have the ability to grow due to the constrictions of the school site. Neither does Saham Toney have any current social infrastructure beyond the pub and community centre. Both the doctors and dentist surgeries in Watton are to capacity, and even Shipdham are not taking new patients.

P1.2 Pedestrian walkways are highly limited here and largely unsafe for children. Due to the rural nature of the area, improvements cannot be made and the addition of pavements would actually destroy the rural character. Cycling is very dangerous around here due to narrow roads and sharp bends. Public transport is limited in the village with only 1 bus to Norwich per day, and it is a walk to the bus stop.

P2F.2 8 Richmond Road is home to a wide array of wildlife due to its large gardens with trees, hedgerows and pond, as well as its proximity to farmland. Any development of this site would be damaging, particularly to species such as newts, hedgehogs, voles etc whose population in the UK has been reduced to dangerously low levels.

P2F.3 It is not possible to mitigate the above damage, especially as there are no plans for public areas or parks. Small individual gardens with lawns would not replace the diversity of the existing gardens. As each property is likely to be demarcated with fencing this would have a significant impact on the travels of hedgehogs etc. There would be increased light pollution from these properties that would have a devastating impact on the bats and other nocturnal animals which inhabit this area.

P2F.4 Given the biodiversity of the existing site and the property's existing solar panels, it will be very difficult for the development to improve the green infrastructure.

P2F.5 Highway visibility cannot be improved due to the sharp bends at either end of the road. Removing hedgerows may help this, but this is very damaging to the ecosystem. I am very concerned that the hedges to the front of the property will be removed by this development. At no point will either 10 or 12 Richmond Road consider removing their hedgerows to improve the visibility.

P2F.6 10 Richmond Road has a septic tank which drains directly onto 8 Richmond Road, which is at a lower elevation. This is unsanitary; the independent assessment included issues with Anglian Water infrastructure, too as additionally supported by the testimony of Mr Derek Moles regarding back up of his sewage

P20.1.2 Safe access to the site cannot be guaranteed as has already been stated in the independent assessment. The shared driveway could only be possible at the boundary with the Alms Houses, which



would damage the character and value of that property, and may necessitate the removal of hedgerows, which the plan promises to protect.

P20.1.3 It is not possible to mitigate the impact on the heritage setting of the church as the development is directly opposite the church tower and main entrance. Unless the development is hidden behind hedgerows and sufficiently set back from the road to reduce visual and noise disturbances, the church will suffer. Whilst the report refers to 'wooded areas', unless the properties were all single storey they would be visible and completely change the skyline and appearance of the area.

P20.1.4 I am concerned that the west hedgerows will be removed to enable the provision of a driveway. Given the importance of biodiversity, hedgerows around the whole property should be preserved. I would also like clarification and assurances that the east hedgerows will be retained along the full side of the site, ensuring that 10 Richmond Road retains its privacy. This should also include trees close to the boundary. The current hedgerow on the boundary was put in and paid for in a joint action by myself and 8 Richmond Road in 2002/3. This hedgerow actually marks the border of the property, the later post and wire fence was put in by myself inside my side of the boundary to prevent my dogs going through the hedgerow at a later date.

P20.1.5 This is not possible. Neighbouring properties including 10 Richmond Road will be adversely affected by the development, with upwards of 36 new neighbours and 12-16+ vehicles accessing the site at all times of the day. At 10 Richmond Road, we also have access issues, such as being denied a driveway, and crossing the road from our property is incredibly dangerous. Adding to this traffic will only add to this danger, which would therefore be a violation of our human rights. The Old Rectory, whose driveway is directly opposite 8 Richmond Road will also find it more difficult leaving their drive with the increase in traffic. Neighbouring properties will also find that their privacy is removed, with properties overlooking them. They will also lose natural views. From the garden and windows of 10 Richmond Road, it is currently possible to see over the garden of 8 Richmond Road to the farmland beyond – this will be lost. Furthermore, all adjacent properties will fall in value due to the development of what is essentially an estate.

P3A.1 & P3A.2 The new properties will be totally out of keeping with the local area. The current dwelling at 8 Richmond Road is a brick house that is sympathetic to its surroundings, aided by large gardens separating it from its neighbours. As the historic centre of the village, the area is not characterised by a high concentration of houses each with good sized gardens and bordering agricultural land. The only exception to this is the small development on the other side of the church, which this plan acknowledges was a failure in design and construction. Furthermore, given the variety of building styles in this area (lump clay brick, the flint and brickwork of the Alms Houses, the converted barns and of course the flint church), what is an appropriate style for houses here? Any properties built here will be concrete blocks with a single skin of brick cladding. They will certainly not be lump clay or have a natural lime plaster such as 10 Richmond Road. I would like to draw your attention to this point about local context: "Retain rural spaces between existing village settlement clusters to avoid their coalescence." The surrounding properties are characterised by large gardens with the properties set back from the road (with the exception of the barn conversion). This is impossible to recreate in the proposed development of 6-8 properties.

P3A.3 As above – what is the local vernacular? We note that in the plan, while distinctive chimneys, quoins and so on are mentioned, there is no mention of traditional lime plastering or other materials characteristic of this area. The new builds will be incongruous with the area.

P3A.4 The proposed development will drastically encroach on existing countryside and integration is not possible. There are no opportunities to improve pedestrian or cycling provision. Extending the footway would mean the removal of verges and hedgerows, which would be an ecological disaster.

P3A.5 The development is completely insensitive to surrounding built forms and layouts, which are characterised by various traditional construction techniques and local materials as well as large spacing

between properties. It is problematic that only developments above 2 stories are accompanied by an appraisal when a large development will have similar visual harm.

P3A.6 Due to the large number of trees and other natural features on the property at 8 Richmond Road, any development of the site will reduce the area of habitats. Due to the space required for houses, the remaining “green” space will be significantly less than what exists already. Furthermore, 8 Richmond Road already has clear and attractive boundary treatments that do not need altering. Key views will not be enhanced here. Approaching the area from SuBridge, the view across the fields will be ruined by the development.

P3A.7 Given the specific character of the area and the historic buildings, a development of multiple properties cannot have a positive impact on the local environment or the local community. Furthermore, safety is a major issue in this area and this site is not suitable for the development of multiple family homes.

P3A.8 This proposal ignores the significance of the historic environment, encroaching on multiple historic properties and adversely affecting the current setting of the property, which has large gardens overlooking fields. Furthermore, neighbouring buildings, all of which are hundreds of years old, will lose material value as they will lose the advantage of being in a rural area, no overlooking windows and full privacy. 10 Richmond Road will particularly suffer as it will not only find itself with up to 8 additional neighbours, which will surely reduce its value, but its value is already lower than it should be due to the unsafe nature of the road which prevents the building of a driveway and which despite being asked the Parish Council or the Highways department of Breckland has done nothing to mitigate, despite being asked numerous times over the last 18 years.

P3A.10 The area is currently unsafe, with limited access to footways, infrequent public transport, and no amenities. Due to the rural character of the roads, footways cannot be added nor can existing footways be widened, which means that these properties will not be suitable for those with mobility issues. The high concentration of properties additionally raises concerns about safety during this current pandemic, as social distancing will be difficult on narrow paths and on a development where there is only one entry/exit.

P3B.1 The density of the proposed development at 8 Richmond Road does not maintain the prevailing character of the area. Saham Toney is quite diverse, with densities varying across the village. In this particular area, a large number of properties on less than half a hectare is completely inappropriate.

P3C.1 Due to the sharp bends at either end of the stretch of road, site access will impact highway safety, particularly as many HGVs and other vehicles use the village as a route to Swaffham, regularly ignoring the speed limit. The development will add a significant number of additional cars to the road, rising from 2 at the current property to upwards of 12. Traffic calming measures are not possible as this is at the edge of the village with speeds rising to 60mph. Only one pedestrian/vehicle access in and out of the site is possible, and even then it is possibly dangerous. Pavements are not possible, as stated above.

P3D.1 Parking is of great concern in terms of its contribution to the visual character of the area as there would be a large number of parked cars visible from the church. Due to the size of the plot, parking spaces would reduce the land available for gardens, which goes against the commitment to improving green spaces and biodiversity.

P3E.1 I am highly concerned that a development of multiple properties would necessitate streetlighting, which is out of character with the area, particularly in the historic centre and this close to farmland. Light will unavoidably spill into neighbouring properties, which currently enjoy good views of dark skies, with the exception of Watton’s light pollution. Streetlighting would also be damaging for wildlife, particularly the sheep on the farmland and the animals in the hedgerows.

P6 8 Richmond Road is surrounded by heritage assets and the development of 6-8 properties will have a detrimental effect on these.

P7A.1 The development will see the removal of the biodiversity of the existing gardens.

P7A.2 Spacing between properties will be reduced.

P7A.3 This development will badly affect the rural and village characters of Saham Toney and are not sensitive to the existing landscape.

P7A.4 A distinguishing feature of this part of the village is the low density of housing marked by large gardens either side of properties. This will be lost.

P7A.5 8 Richmond Road backs directly onto farmland, which should be avoided. The property also boasts a number of features that should be protected, but cannot be if development goes ahead.

P7A.6 The setting and views of this area have been overlooked in the plan and will be damaged by the dense development of the site.

P7A.7 As the site falls outside the centre of the “modern” village (as opposed to the historic centre around the church), it is essential that the area retains its rural character and aesthetic. This is not possible with such a large development.

P7B.1 The site falls on Key View 2, which is defined by countryside views, hedgerows and a small number of old houses of historic value and a limited number of “new” properties (the new barn and 8 Richmond Road in its current form). The development of 8 Richmond Road will have a significant impact on this view and will badly damage the village’s character.

P7C.1 The sites designated as local green spaces are highly limiting and, in my opinion, misleading. While these may benefit biodiversity, many of these spaces are not accessible to the public. While this policy refers to preventing their development, other parts of the plan refer to the provision of green spaces for the enjoyment of residents. Saham Mere is private, and the churchyard is not an open space to be enjoyed. Neither site could be developed due to the limitations of the sites, and their inclusion detracts from other green spaces that should be preserved. 8 Richmond Road has a large amount of biodiversity in its current gardens that would be lost, and the development would be detrimental to surrounding farmland.

P7D.1 Due to the density of the proposed development at 8 Richmond Road, it would not be possible to recreate the same level of biodiversity and it would definitely be possible to enhance it. Furthermore, any development would need to ensure that only native plants are used in order to best promote native wildlife, especially insects. Such flora is already well-established and its removal would disturb extant habitats.

P7D.2 For the above reason, this will be a net loss of biodiversity, which is not permitted. The loss of areas with water in particular will have a devastating impact on species like frogs and newts, which would not be recreated in any development.

P7D.5 The hedgerows were planted to provide a habitat and network for hedgehogs. Even if hedgerows were retained, any fencing would be highly damaging to hedgehogs, which are in great abundance in the area. The natural style of the gardens of 8 Richmond Road cannot be retained if 6-8 houses are to be put in their place. Thus, this is against your policy of “improv[ing] the naturalness of green spaces and access to them”. Indeed, the use of fences and other partitioning structures except for natural hedgerows would reduce existing connective between spaces and damage wildlife.

P7D.6 Due to the high abundance of biodiversity through the large gardens, it will be impossible to restore biodiversity once houses are constructed. This loss cannot be avoided either. Furthermore, where will this offsetting take place?

P7D.7 8 Richmond Road has large gardens which are undeveloped but have a large amount of flora, including trees and hedges, which benefit the local ecosystem. According to your policy, such spaces should be preserved, but this would not be possible for a development of 6-8 houses.

P7E.1 This property already has solar panels and its gardens are used to grow a variety of native fruits and vegetables for the owners. There would be no net gain in its development.

P7E.4 Due to the high density of housing, soft landscaping cannot be incorporated.

P7E.5 Similarly, due to the high density, the site will lose a well-established nature pond and it will not be possible to replace this with “small water bodies”. Even if one or two were possible, this would not make up for the loss of habitat and biodiversity.

P7F.2 While the site only has tree preservation orders on its 2 of its trees, its trees and hedgerows are long established and provide homes to numerous birds, animals and insects. Its loss would be catastrophic. Your own plan says that developments which include additional planting of flora would be supported – this development will result in a net loss.

P7F.3 A full inspection of the flora at 8 Richmond Road should be carried out to confirm the above points. If any of these are lost, it will not be possible to “enhance the landscape”, but only destroy it.

P7F.4 What is an appropriate level of new tree and hedge planting? You have already stated that you intend to remove hedgerows, and the building of 6-8 houses will necessitate the removal of trees.

P7F.5 Due to the density of the proposal, the protection of trees and hedgerows, particularly given that they are long established and have long roots, will be very difficult.

P8C.1 & P8E While not an issue of surface water discharge, 10 Richmond Road’s septic tank drains onto the land of 8 Richmond Road, which significantly reduces the acceptable area for building and due to the difference in land height the garden also drains onto this land.

There are no circumstances that we will accept this development as it will have such a negative impact on us, our neighbours and the village as a whole and feel that it is our civic duty to object as strongly as we can.

#### **RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2F, 2O and 6 specifically and various individual policies as noted in the comments

#### **REACTION TO REPRESENTATION(S):**

**Comment 1:** It is pointed out that contrary to the comment, the Plan does not include development plans for STNP15. Such plans will only be made available when a future planning application is submitted. The respondent appears not to have understood that a site allocation in a neighbourhood plan is not a planning application, and is not required to present the level of detail that must accompany the latter. It is hence invalid to make guesses or to speculate as to what form a planning proposal might take, and then use that as a means to support an objection to a site allocation. What can be said with certainty is that any future planning application will be required to comply with the Plan’s policies. It would appear the respondent has mistaken the Site Assessment and / or Site Selection Report for the Neighbourhood Plan. The former refers to the original proposals put forward by the landowner during a call for sites that preceded site allocations. At that time two options were submitted, one for 2 dwellings on part of the overall plot (STNP11), and the other for 4-8 dwellings on the full plot (STNP15). The former was subsequently withdrawn by the landowner. The site assessment and selection processes showed the latter to be suitable for development provided it was limited to 6 dwellings and subject to a range of policy criteria implemented to overcome various constraints.

It is not proposed to respond to the emotional aspects of the comment, other than to point out that the allocated site anticipated development period, as stated in Policy 2O, is 2033 – 2036, so the proposal cannot fairly be said to be driving anyone from their home.

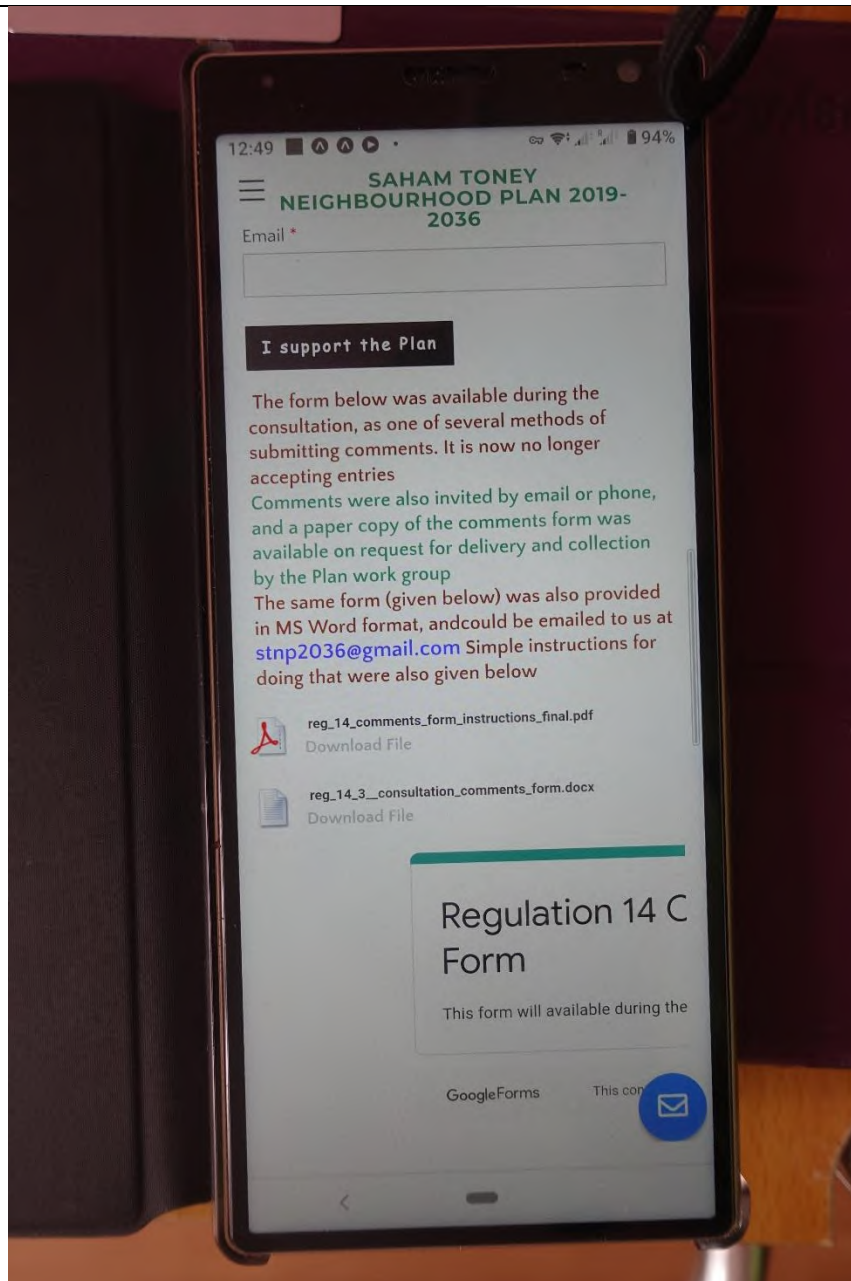
**Comment 2:** Unlike a planning application a Neighbourhood Plan is not required to individually notify those who may be affected by its proposals. Nevertheless, the fact that STNP15 is allocated has been widely publicised around the village, via the website, at several village presentations, via a series of online slideshows and in the monthly parish magazine. Its allocation has not changed since the second Regulation 14 consultation on the Plan (August-October2019), during which a 16-page pamphlet about the Plan was delivered to every household, and included a map showing the location of all site

allocations. An updated pamphlet including the same map was available on request (a fact well publicised) throughout this consultation. A telephone hotline operated throughout the consultation period to deal with questions about the Plan from villagers. Hence it is untrue a villager would need to read the whole plan in order to find out about site STNP15.

The suggestion that it was difficult for those without internet access to find out about the Plan is incorrect and an ill-advised attempt to discredit the consultation in order to achieve the respondents aim to remove STNP15 from the Plan. The comment that things were done dishonestly is false and offensive. In previous village presentations and articles in the Parish magazine it has repeatedly been stressed that all comments are welcomed, including objections. During the consultation a range of measures were adopted to ensure those without internet access were not excluded from the process:

- Ways of finding out about the Plan and how to make comments on it were included in the 4-page leaflet that was hand delivered to every household at the start of the consultation. Hence even someone who did not leave their home throughout would have been aware.
- A consultation hotline was publicised in the aforementioned leaflet, in two issues of the parish magazine (which each household receives), in two issues of the local community newspaper and on posters and notices around the village. It operated for 11 hours a day on weekdays throughout the consultation, with an answering machine available at other times.
- All publicity on the Plan made very clear that paper copies of the Plan, 16-page leaflets about it and hard copy versions of the comment form were available on request, and would be safely delivered and collected by members of the Plan work group.

The website is readily accessible on all devices, though it is naturally at a smaller scale on a mobile phone than a desktop computer. The screenshot below is of the consultation page when viewed on a mobile phone, and shows clearly that the form for comments is given the same prominence as that for simply expressing support without comments, and that the comments form was also available for download as a Word or pdf file as an alternate to the online form.:



The comment on website design is mean-spirited, insensitive and unnecessarily disparaging, and fails to recognise that the site was prepared by a villager with no prior knowledge of website design, giving up large amounts of his own time at no cost to provide villagers and others with regularly updated and comprehensive information about the Plan. Depending on the device the site is viewed on the main sections appear either as tabs at the top of the page, or on smaller screens by clicking on a menu icon. One of the main tabs is for documents and at a single click of that, all documents relating to the consultation may be found. Some navigation of the site is required, simply because it contains such a wealth of information, far more than has been found on any other neighbourhood plan website. If difficulties were experienced by the respondent, a call to the hotline or an email to STNP would have quickly resolved the issue, without the need to make offensive remarks at the close of the consultation period.

There is absolutely no bias in the way the website presents information. There is equal opportunity to support the plan without comment, support it with comment and to object to it. To simply support the Plan requires completion of a form, just as does the making of comments or objections, but naturally the former is a simpler form as it does not require a means of entering text, since no comments are being made.

The support and comments form were provided on the same page of the site and given equal prominence as shown by the screenshot below

Regulation 14 (3) Consultation Ju X +

ation-14-3-consultation-june-2020.html

HOME DOCUMENTS CONSULTATIONS SITE ALLOCATIONS MORE...

**HERE**  
Details of online 'drop-in' meetings held during consultation may be found **HERE**

Although consultation is now closed, you can still show your support for the Plan by filling in your details below and clicking "I support the Plan"

*\* Indicates required field*

Name \* Email \*


First Last


**I support the Plan**

The form below was available during the consultation, as one of several methods of submitting comments. It is now no longer accepting entries

Comments were also invited by email or phone, and a paper copy of the comments form was available on request for delivery and collection by the Plan work group

The same form (given below) was also provided in MS Word format, and could be emailed to us at [stnp2036@gmail.com](mailto:stnp2036@gmail.com) Simple instructions for doing that were also given below

 [reg\\_14\\_comments\\_form\\_instructions\\_final.pdf](#) Download File

 [reg\\_14\\_3\\_consultation\\_comments\\_form.docx](#) Download File

## Regulation 14 Consultation Comments Form

This form will available during the Regulation 14 public consultation

It is very clear the comments form was not concealed, though again naturally if the respondent was using a mobile phone there would of course have been a greater need for scrolling.

**Comment 3:** Part of the site is within the settlement boundary. The Local Plan allows development immediately adjacent to the settlement boundary and the Neighbourhood Plan conforms with that. Given that a 6-house allocation for the site was included in the second Regulation 14 version of the Plan, published in August 2019 (to which no comments were made by villagers regarding STNP15), and the landowner has not suggested making any changes to the allocation since then, it seems unlikely that the landowners informed the respondent during 2020 that development would be for only one property, and even were that the case, the Plan has made no such statement. Given the site's location partly within the settlement boundary a planning application for it could be submitted out with the Neighbourhood Plan, and therefore not subject to any of that Plan's requirements, in reasonable expectation of approval. Its allocation means any future planning application will be subject to more stringent requirements than those in the Local Plan or NPPF alone, and that fact should assuage rather than add to the respondent's concerns.

The emotional aspects of this comment do not require response by STNP.

**Comment 4:** This comment simply speculates about a future planning application. The Plan does not stipulate any of the design and layout aspects the respondent alludes to.

**Comment 5:** The Plan includes a wide range of policy measures to preserve and where possible enhance biodiversity and green infrastructure. At the time of a future planning application it will be a requirement that a satisfactory ecological assessment is submitted. The Strategic Environmental and Habitats Regulations Assessments both conclude that if the site is developed in accordance with the Plan's policies there will be no harmful environmental impact.

**Comment 6:** Much of this comment simply speculates about a future planning application. Submission of a Heritage Statement is a policy requirement for STNP15, and that will need to demonstrate that any

impact on the setting of designated and undesignated heritage assets is acceptable. Nothing in the Plan suggests that the development will 'dwarf the old Alms House' (6 Richmond Road), so this part of the comment is unfounded.

The nearby early 21<sup>st</sup> century development of Church Barns on Richmond Road, demonstrates how sympathetic development in keeping with local heritage character can be successfully integrated with existing buildings.

Regardless of their lack of designation in the Plan, buildings such as Church cottages are dealt with under Policy ENV 07 of the Local Plan.

**Comment 7:** Important aspects of this comment are incorrect and therefore refuted. The independent assessor referred to (i.e. the site assessment report by AECOM) did not determine that access would be dangerous. That assessment highlighted provision of safe access as a constraint to development. The ability to achieve safe access has subsequently been demonstrated by the Transport Study. Neither did the site assessment report suggest a drive would be needed at the boundary with 6 Richmond Road, in fact it made no suggestions in this respect. The Transport Study concluded there was 59m visibility to the bend in Richmond Road to the east. If access is implemented at that distance, it would be approximately 27m from the boundary between 6 and 8 Richmond Road.

Any potential impact on tree roots is an issue for a future planning application, most specifically in an arboricultural assessment. Comments about that at this stage are speculative.

Rather than the 16 vehicles speculated (for a site incorrectly noted as for 8 dwellings rather than 6), the Transport Study concluded that the site will lead to 5 additional vehicular trips during peak periods. The problems the respondent experiences due to having a property on the bend in the highway are irrelevant to the Plan and its allocation of site STNP15.

The Transport Study includes a review of collisions along this stretch of road and does not identify multiple accidents, but says there is no pattern of accident hotspots around the village.

**Comment 8:** We are unable to comment on a covenant that may or may not exist but has not been presented to us. If such exists, it will be a matter for a future planning application.

Implementation of building regulations is not a matter for a neighbourhood plan, but nothing in the Plan is stipulated in a way that would lead to them being contravened. It is however pointed out the Part H of the Building Regulations requires soakaways to be 5m from buildings, roads and boundaries, not 15m as stated in the comment, and if the soakaway in question is on land forming part of STNP15, any future developer will be at liberty to remove and replace it at a more convenient location in the unlikely event it proved to be a constraint on development. Comments regarding the possible layout of development with respect to a soakaway field and oil tank are entirely speculative and without foundation based on the site allocation policy. These are matters for a future planning application.

**Comment 9:** Again, most of the comment is incorrect or speculative. The Transport study concludes that at peak there will be 5 additional vehicular trips, not 16. There is no reason to suppose a small development will lead to noticeably more noise. Many driveways in Saham Toney access the highway opposite other dwellings: that is simply the nature of the settled form, not something unusual relating to STNP15, and does not contravene Highway Authority guidelines. Even so comment on the layout and location of access to the site is speculative and can only be addressed when a future planning application is decided.

**Comment 10:** It is an incorrect and frankly scurrilous statement to suggest that the Plan 'admits STNP15 fails to meet multiple criteria'. It most definitely does not. All allocated sites were objectively reviewed against a range of criteria as part of the site assessment and selection processes, to the extent that was reasonable and possible to do when preparing allocation policies (i.e. to a lesser level of detail than will be considered when a future planning application is submitted).

Sites were assessed independently of both the parish council and the Plan work group, neither of which had any influence over their conclusions. The site selection process adopted has been subject to scrutiny by villagers (and others, including planning officers) at a village presentation prior to allocations being confirmed and during two previous formal Regulation 14 consultations on the Plan and its supporting documents (including the site selection report). At no stage have any objections been raised to either the methodology adopted or the way in which that has been applied.



**Comments on policy criteria:** These to a very great extent duplicate comments made by respondent 8, with some minor editing in a few cases. Hence reference should be made to the reaction to respondent 8's comments numbers 8-53. It is noted that the duplication of comments by members of the same household does not add to their weight or validity.

**ACTION TAKEN:**

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

**RESPONDENT NUMBER: 10**

**DATE:**

14 August 2020

**Comments:**

I have requested that [REDACTED] submits my objections to the plan as I do not have access to an email or the internet and do not wish to.

**Comment 1:** I feel that people of my generation without access to the internet have been discriminated against in the nature of how these consultations have been conducted. If other people had not alerted me to the proposed development adjacent to my property, I would have been completely unaware and unable to make my objections known. Therefore, I feel that my rights have been violated in this matter. I am opposed to the development of the site at 8 Richmond Road (STNP 11 & 15) for a number of reasons and the knowledge that this could happen has had a significantly negative impact on my wellbeing and mental health, in what already has been a difficult period due to the Coronavirus lockdown.

**Comment 2:** I bought my property adjacent to an existing house with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6 houses to be built on this site bordering my property. This will change the nature of my home completely. Even up until earlier this year I was assured by the owners of 8 Richmond Road that any development plans were only for one property and discovering that the plans are actually for 6-8 properties is causing me undue stress and anxiety which at my age is highly detrimental for my health.

**Comment 3:** I am particularly concerned by the reports that state that the current driveway would be unsuitable for the purpose of this development and recommends that the access road be located along the boundary of my property, which coincidentally is next to my bedroom as my property extends up to the boundary. The likelihood is that this access road would be in use constantly by a minimum of 12 resident vehicles and far more when guests, deliveries and service vehicles are included in the equation. This would have a significantly negative impact on my quality of life and my mental health. Additionally, I am concerned about the proposed siting of this access road as there is an oak with a preservation order on it along this boundary, even if the road goes around it the amount of traffic is likely to have a negative impact on its roots and on the hedgerow along the boundary and the abundance of nature that lives within it.

**Comment 4:** Richmond Road has become increasingly busy since I have lived in my property. There are already large numbers of lorries, both for SuBridge and other local industrial areas, as well as a large number of vehicles using the village as a through road to Swaffham. I often find it difficult getting out of my own drive safely (and this located even further from the bend than the proposed access road) and it is made doubly difficult by the fact that there is very limited visibility due to blind bends on both sides of the road. There is limited pedestrian access as the pavement is only on one side of the road and on my side stops shortly after my property. This an accident black spot and increased numbers of vehicles trying to pull on and off the road for this development will only make that risk higher.

**Comment 5:** My other objection to this planned development is the impact that it would have on the historic nature of the area. My property (The Alms House) is already noted to be a heritage asset, the Old Rectory close by is Grade II listed and St George's Church is Grade I listed, however within this area there are additional buildings of historic and heritage importance and character such as the Rectory Barns opposite my property and Church Cottages which are on the opposite boundary to the proposed

development. These cottages are not currently on the Heritage asset register, but should be due to their age, their construction and their historical links to village and church life. To build a new property development on a site surrounded by historic properties will have a highly negative impact on the historic centre of the village and the views of the village from the Swaffham entrance to the village, from the Church, the Church Green and coming up Richmond Road from the Watton direction.

**RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2F and 2O

**REACTION TO REPRESENTATION(S):**

**Comment 1:** The claim of discrimination against those without internet access is strongly refuted. It is unreasonable to suggest awareness of the Plan and the consultation depended on the respondent being alerted by others, because, even if confined to home, a 4-page leaflet about both was hand-delivered to every household in the parish at the start of the consultation and gave a range of accessibility options for those without internet access, which comprised:

- Safe and hygienic delivery of a paper copy of the Plan on request to a hotline that was open 11 hours a day on weekdays throughout the consultation and took messages outside those times;
- Safe and hygienic delivery of a 16-page information pamphlet about the Plan, which was itself an update to a similar pamphlet hand-delivered to every household at the time of the second Regulation 14 consultation in August 2019 (and which included a map of allocated site locations);
- Safe and hygienic delivery and collection of a paper copy of the comments form;
- A telephone hotline that was open 11 hours a day on weekdays throughout the consultation, to answer villager queries about both the Plan and the consultation, and to take comments;
- Articles publicising the consultation and giving accessibility information in 2 issues of the parish magazine (1 July and 1 August);
- Articles publicising the consultation and giving accessibility information in 2 issues of the local community newspaper;
- Posters and notices announcing the consultation and giving accessibility information displayed at many prominent outdoor locations around the village.

It is most firmly asserted that nobody's rights have been violated during the consultation.

It is not intended to comment on respondent's wellbeing and mental health, other than to point out that the allocated site anticipated development period, as stated in Policy 2O, is 2033 – 2036, and hence cannot reasonably be said to be impacting on those at the present time.

**Comment 2:** Mention of 6-8 new homes is incorrect, since the allocation is for 6 new dwellings. It is pointed out that much of the land allocated as site STNP15 is in fact within the settlement boundary. Furthermore Local Plan Policy HOU 04 allows development 'immediately adjacent to the settlement boundary', so regardless of allocation in the Plan, a planning application this site could be submitted for the site at any time, and in that case would not be subject to the many measures to manage development that are set out in the Plan. Given that a 6-house allocation for the site was included in the second Regulation 14 version of the Plan, published in August 2019 (to which no comments were made by villagers regarding STNP15), and the landowner has not suggested making any changes to the allocation since then, it seems unlikely that the landowners informed the respondent during 2020 that development would be for only one property, and even were that the case, the Plan has made no such statement. Given the site's location partly within the settlement boundary a planning application for it could be submitted out with the Neighbourhood Plan, and therefore not subject to any of that Plan's requirements, in reasonable expectation of approval. Its allocation means any future planning application will be subject to more stringent requirements than those in the Local Plan or NPPF alone, and that fact should assuage rather than add to the respondent's concerns.

The emotional aspects of this comment are not a planning matter and so are deliberately not addressed herein.

**Comment 3:** The report noted about the location and details of access to the site, have not been taken from the Plan or any of its supporting documents. It can only be assumed that the person who made the respondent aware of the site allocation passed on his/her own speculation on this topic (and in doing so without any foundation, helped created the stress the respondent notes in comment 2). The site access

road, for which again there are as yet no details to make valid comment on (those coming only when a planning application is submitted), will not in any case run beside the Alms houses: (a) because they do not directly adjoin the allocated site, and (b) because their setting is offered protection under Policies 3A and 6. Site access is required to offer 59m visibility of the highway in both directions. If access is located 59m from the bend in Richmond Road to the east of the site, that access will be approximately 27m from the boundary with 6 Richmond Road, indicating there is sufficient flexibility to locate the access without being directly adjacent to the boundary of 6 Richmond Road.

**Comment 4:** The transport study concluded that there is adequate visibility in both directions from the site and that safe access is achievable. The transport study reviewed collision data throughout the parish and found no evidence that this section of Richmond Road is 'an accident black spot' as suggested by the respondent. The site is well served by a footway immediately fronting the site and providing a safe route to neighbouring Watton as well as the community centre, pub and village school.

**Comment 5:** Submission of a Heritage Statement is a policy requirement for STNP15, and that will need to demonstrate that any impact on the setting of designated and undesignated heritage assets is acceptable. The nearby early 21<sup>st</sup> century development of Church Barns on Richmond Road, demonstrates how sympathetic development in keeping with local heritage character can be successfully integrated with existing buildings. Certain buildings have been defined in the Plan as non-designated heritage assets since the Plan's first Regulation 14 pre-submission in March 2018. The policy making those designations received over 95% support from villagers, and no suggestions were made to designate other buildings. Similarly no suggestions for additions were made during the second Regulation 14 consultation, August-October 2019. It is not proposed to add further designations to the Plan at this stage, when villagers will not have a further chance to consult on them (the final consultation on the Plan being limited to matters concerning the basic conditions). Regardless of their lack of designation in the Plan, buildings such as Church cottages are dealt with under Policy ENV 07 of the Local Plan.

**ACTION TAKEN:**

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

RESPONDENT NUMBER: 11	DATE: 14 August 2020
<p>I have requested that [REDACTED] submits my objections to the plan as I do not have access to an email or the internet and do not wish to.</p> <p><b>Comment 1:</b> I feel that people of my generation without access to the internet have been discriminated against in the nature of how these consultations have been conducted. If other people had not alerted me to the proposed development close to my property, I would have been completely unaware and unable to make my objections known. Therefore, I feel that my rights have been violated in this matter. I am opposed to the development of the site at 8 Richmond Road (STNP 11 &amp; 15) for a number of reasons which I believe will mean that it will be detrimental to the village and local wildlife.</p> <p><b>Comment 2:</b> I bought my property adjacent to existing houses with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6-8 houses to be built on this site close to my property. This will change the nature of my home completely.</p> <p><b>Comment 3:</b> Richmond Road has become increasingly busy in the 15 years I have lived in my property. There are already large numbers of lorries, both for SuBridge and other local industrial areas, as well as a large number of vehicles using the village as a route to Swaffham. I often find it difficult getting out of my own drive safely and it is made doubly difficult by the fact that there is very limited visibility due to blind bends on both sides of the road. There is limited pedestrian access as the pavement is only on one side of the road and on my side finishes before the SuBridge Bend. This an accident black spot and there have been a number of accidents on this stretch of the road during my time living here. Increased</p>	

numbers of vehicles trying to pull on and off the road for this development will only make that risk higher and increase the risk to me trying to pull on and out of my driveway.

**Comment 4:** The bend opposite the church is already treacherous and any parents trying to cross the road with children safely will struggle. My neighbours have to cross this road daily to access their vehicles as they are not allowed a driveway (due to the dangerous nature of these bends) and have had many near misses. I find it hard to understand how an access road for potentially 20+ vehicles can be considered when the road is already considered too unsafe for one property to be allowed a driveway. Vehicles already travel well above the speed limit and this is not regulated by highways or the police.

**Comment 5:** I am additionally concerned with the impact that this development would have on the sewerage pipes in this end of the village. I regularly have issues with the sewage backing up to my property and have been informed by Anglian Water that this is due to the main sewerage pipes not being adequate to cope with effluent from this end of the village, this has become worse as a direct result of new properties that already have been built. An additional 6-8 properties would make this significantly worse.

**Comment 6:** Another objection to this planned development is the impact that it would have on the historic nature of the area. The old Alms Houses are already identified as a Heritage Asset and the Old Rectory is Grade II listed and St George's Church is Grade I listed. My property (1 Church Cottages) and the adjoining cottage have not been identified as a heritage asset, but should be due to their age (approx. 1850's), their construction (Norfolk Clay Lump), their architectural features and their historical links to both village and church life. To build a new property development on a site surrounded by historic properties will have a highly negative impact on the visual aspect of the historic centre of the village and the views of the village from the Swaffham entrance to the village, from the Church, the Church Green and coming up Richmond Road from the Watton direction.

**Comment 7:** As a keen gardener and wildlife enthusiast I am concerned about the impact that the proposed development would have on local wildlife as the gardens and hedgerows at 8 Richmond Road provide habitats for a diverse range of wildlife which uses the gardens of the adjacent properties. This wildlife includes hedgehogs, bats, small mammals including moles, shrews, voles and mice, pond life including newts, tadpoles, frogs, water boatmen, water beetles, dragon flies etc. There is also an abundance of birds including blue tits, great tits, swifts, sparrows, blackbirds, thrushes, gold crests, bullfinches, woodpeckers etc as well as owls which hunt here of a night-time.

#### **RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:**

Policies 2F and 2O

#### **REACTION TO REPRESENTATION(S):**

**Comment 1:** This comment is an almost exact duplicate of respondent 10's comment 1, hence reference is made to the reaction to that.

**Comment 2:** Mention of 6-8 new homes is incorrect, since the allocation is for 6 new dwellings. It is pointed out that much of the land allocated as site STNP15 is in fact within the settlement boundary. Furthermore, Local Plan Policy HOU 04 allows development 'immediately adjacent to the settlement boundary', so regardless of allocation in the Plan, a planning application this site could be submitted for the site at any time, and in that case would not be subject to the many measures to manage development that are set out in the Plan.

**Comment 3:** This comment is an almost exact duplicate of respondent 10's comment 4, hence reference is made to the reaction to that. It is respectfully pointed out that the respondent's drive is on the crown of the bend in Richmond Road, directly opposite the junction with Pound Hill, and hence presents significantly different issues regarding safety than will be the case for STNP15.

**Comment 4:** Development of the site will neither add to nor diminish the danger experienced by those who choose to cross the highway at a blind bend. The Richmond Road footway allows pedestrians to find a safe place to cross to another footway on the opposite side, and away from the bend. Suggesting that a 6-house development of 1, 2 and 3-bedroom properties will result in 20 vehicles is exaggerated speculation. The Transport Study calculates there will be a maximum of 5 additional vehicular trips at peak times.

**Comment 5:** Policy 9 includes a clear requirement that planning applications must demonstrate confirmation from Anglian Water that there is sufficient capacity in the foul sewer network to service new development. Anglian Water made independent site assessments of all sites put forward for allocation, including site STNP15 (at a time when it comprised 8, rather than 6 dwellings) and did not object to STNP15. In notes to its assessments, Anglian Water also pointed out its statutory obligation to provide sufficient capacity for sites having the benefit of planning permission.

**Comment 6:** This comment is to a large extent a duplicate of respondent 10's comment 5, hence reference is made to the reaction to that.

**Comment 7:** These are matters for consideration at the time of a future planning application. Policy 2F requires that such an application will be required to include a satisfactory ecological assessment. Furthermore, policies 7D, 7E and 7F provide appropriate safeguards in respect to the concerns raised.

**ACTION TAKEN:**

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

<b>RESPONDENT NUMBER: 12</b>	<b>DATE:</b> 14 August 2020
<b>Comment:</b> Concern that the surface water drainage system cannot cope in certain areas and needs to be improved before any new development in the Pages and Chequers Lane area	
<b>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</b> Policies 8A-8H	
<b>REACTION TO REPRESENTATION(S):</b> Policies 8A-8H include robust requirements to ensure that the development of new sites does not add to flood risk either onsite or offsite. Those policies have been accepted by Anglian Water and praised by the Lead Local Flood Authority, who had no comments on them. It is respectfully pointed out that new development cannot solve existing village problems in this respect and that is a matter for the Lead Local Flood Authority, but the Plan does ensure such problems will not be increased by development and in feasible ways on development sites themselves will assist in reducing those risks, for example by localized improvement of watercourses and better future maintenance of them. The respondent may find the reactions to respondent 1 of interest.	
<b>ACTION TAKEN:</b> None required.	

<b>RESPONDENT NUMBER: 13</b>	<b>DATE:</b> 14 August 2020
<b>Comment:</b> Utilities and the drainage network need to be improved before any new development	
<b>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</b> Policy 1 Policies 8A-8H and 9	
<b>REACTION TO REPRESENTATION(S):</b> Policy 1 deals with appropriate upgrade of utilities infrastructure and policy 9 requires adequate capacity in the foul sewer system Policies 8A-8H stipulate the use of sustainable underground drainage systems with offsite runoff limited to no more than pre-development rates and volumes – i.e. ensure no additional load on the wider drainage network. See also response to respondent 14.	

<b>ACTION TAKEN:</b> None required
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<b>RESPONDENT NUMBER: 14</b>	<b>DATE:</b> 14 August 2020
<b>Comment:</b> Seek S106 funding for a footpath link along Cley Lane to link with Watton. Ensure payment by placing the Covenant onto the Property purchaser.	
<b>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</b> None specific as this is an aspiration not a matter of land use. A Neighbourhood Plan cannot dictate S106 payments to be applied as that is a matter for the Local Planning Authority	
<b>REACTION TO REPRESENTATION(S):</b> See reaction to respondent 3	
<b>ACTION TAKEN:</b> None required	

<b>RESPONDENT NUMBER: 15</b>	<b>DATE:</b>
<b>Comment:</b> No support for the development on STNP1, 4, 7, and 16. Too many houses will impact on village life, law and order, traffic and the local school. This village has already been over developed	
<b>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</b> Policies 2H, 2J, 2K and 2P	
<b>REACTION TO REPRESENTATION(S):</b> <b>Comment 1:</b> With respect, the rigorous, objective and analytical process of site assessment and site selection applied, shows these three sites to be suitable for development. Each has a robust set of policy requirements which will ensure that in combination with the Plan's general policies, development is managed in a way that will prevent to impact on village life that the respondent is concerned about. The Plan also balances development and growth with increased protection and enhancement of the local environment. The sites have been masterplanned (see Policy 2G) to give greater reassurance they may be developed in an appropriate way. All four sites must deliver affordable housing (a total minimum of 12 homes) and Policy 2D includes a local lettings criterion that means locals will be given first priority for such houses. Site STNP16 is allocated together with a large area of amenity land that will be made publicly accessible, and is thus a benefit to the village. The Transport Study shows the development of all 9 allocated sites will have a negligible impact on the local road network, and will not lead to increased queuing at key junctions or reduce highway safety Schooling is matter for the County Council and is outside the scope of the Plan.	
<b>ACTION TAKEN:</b> None required	

<b>RESPONDENT NUMBER: 16</b>	<b>DATE:</b> 14 August 2020
<b>Comment:</b>	

The village has already been overdeveloped and will become a large housing estate. The school is currently unable to accept more pupils and more development would add to recent flooding issues. This only benefits the land owners who are somewhat greedy and not interested in the future make-up of the village
<b>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</b> General
<b>REACTION TO REPRESENTATION(S):</b> None of the allocated sites, individually or in combination comprise a 'large housing estate'. The Plan specifies phasing of development and links that to adequate infrastructure provision. Over its 16-year period on average between 4 and 5 new homes will be developed each year. This is less than the rate at which development has taken place over the last 9 years when a neighbourhood plan was not in place. Schooling is matter for the County Council and is outside the scope of the Plan. With regard to flooding issues see responses to respondents 1 and 13. The central principle of the Plan is to balance development with improved preservation and enhancement of all that's best in the local environment, so although developers can reasonably expect to make profits, the village will also benefit. It is not the purpose of a Neighbourhood Plan to prevent suitable development
<b>ACTION TAKEN:</b> None required

## **APPENDIX C6. Pre-Submission Consultation June – August 2020: Parishioner “Tick-Box” Questionnaire Results**

The results of the consultation questionnaire were as follows:

- 56 parishioners indicated support for the Plan, without comment;
- 8 parishioners indicated support for the Plan, subject to their comments (given in Appendix C5);
- 1 parishioner submitted comments (see Appendix C5), without indicating either support for or opposition to the Plan;
- 7 parishioners indicated they did not support the Plan and gave their reasons for that (given in Appendix C5)