

Chapter 20a: CONSULTATION RESPONSES FROM JUNE – JULY 2017.

- **North Norfolk District Council**

From: Iain Withington [mailto:Iain.Withington@north-norfolk.gov.uk]

Sent: 10 July 2017 14:06

To: tony.barnett6@btinternet.com; Imogen Waterson

Subject: Corpusty & Saxthorpe Pre submission NNDC comments.

Dear Mr Barnett,

Thank you for Consulting North Norfolk District Council on the pre submission consultation version of the Corpusty and Saxthorpe neighbourhood plan. The attached schedule of comments represents the Council's formal comments and detailed advice at this time on the emerging neighbourhood plan as formally agreed.

As agreed at the working party meeting of the 19th June and in subsequent correspondence with Imogen we would be happy to schedule a further session to review the Council's formal response, the wider combined feedback from the consultation and also include discussion on the requirements and expectations of the next formal stages required for submission and examination.

Our advice is that this should be scheduled after the closing date of the consultation and following the completion of a summary schedule of comments.

We look forward to hearing from you in due course

Yours sincerely

Iain Withington

Planning Policy Team Leader

Corpusty and Saxthorpe Neighbourhood Plan.

Pre submission consultation, 5th June- 17th July 2017

Thank you for the opportunity to comment on the emerging Neighbourhood Plan. The council have previously provided detailed comments on emerging versions covering the structure of the document and specific policy areas and provided financial support and ultimately undertaken a number of individual workshop/review sessions with the Neighbourhood Plan group on the emerging consultation document. The attached schedule forms the Council's formal comments on the emerging neighbourhood plan at regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012. It is at this stage where there is an opportunity for statutory bodies, residents of the Neighbourhood Plan Area and

those that have an interest in the Neighbourhood Plan to submit formal comments on the Pre Submission Draft Plan.

The comments were discussed at the Planning Policy and Built Heritage Working Party held on the 19th June and subsequently ratified by the Cabinet through delegated authority of the Leader.

Summary

The production of the Neighbourhood Plan is to be broadly welcomed on the basis that is to bring more local land use matters into consideration in the determination of any planning applications and has undoubtedly raised awareness on the importance of the built environment within the parish. It is recognised that considerable time has been spent in the production of this emerging plan mainly by a limited number of volunteers with limited planning knowledge.

The plan seeks to provide an extensive framework over a number of key objectives and as ever with such a broad approach runs the risk of general conformity issues with the adopted Local Plan of the Council, along with potential overlap with the emerging Local Plan. In order to remain effective and useful in the determination of applications it is recommended that wherever possible neighbourhood plans are kept as simple and focused as possible. **Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan.** Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area as long as they do not seek to duplicate existing non-strategic process and policies. Any repetition of national and local policies should therefore be removed.

Although considerable efforts have been made through ongoing dialogue there remain a number of areas of concern, specifically that there are areas that may not be totally justified through evidence or be in conformity with the Local plan and legislative process. It is recognised that at this stage the inclusion of such matters may be in response to community aspirations, but never the less going forward they will have to be addressed. Following the regulation 14 consultation there is an opportunity for the neighbourhood Plan group to review and adjust the plan and the opportunity to document specific evidence before submission to the council under regulation 15 &16. It is at this stage that the Council will review the Draft Neighbourhood Plan and submission documentation for conformity to the entire legal framework.

Comments at this stage are intended to be specific to the overall emerging plan and each policy area. The comments summarised in the attached schedule have been collated from across relevant departments and are intended to be informative and constructive to aid the formation of a sound document and the effective formation of and use of policies and complement the wider existing and emerging Development Plan Framework.

Next stages

Following the pre submission stage the emerging Neighbourhood Plan should be reviewed and updated to form the proposed Neighbourhood Plan. A schedule of comments is required in order to summarise the comments received and show how all the comments have been used to inform the preparation of the plan. It is this schedule that will form part of your consultation statement and help demonstrate how the plan was been informed by the consultation. An example of how this could be laid out has previously been sent via email on the 26.06.17

Upon submission the proposed plan is required to be accompanied by a number of legislative documents:

- A map which identifies the proposed Neighbourhood Area;
- A consultation Statement - detailing the details of people and organisations consulted, how they were consulted, a summary of the main issues and concerns raised through the consultation process and descriptions of how these were considered and addressed in the proposed Neighbourhood Plan;
- A basic Conditions Statement - a statement that explains how the plan has had appropriate regard to national policy, how it contributes to the achievement of sustainable development, how it is in general conformity with the strategic policies in the development plan for the local area and how the plan is compatible with EU obligations, including human rights requirements;

To aid this process the Council has undertaken a habitat scoping report on an emerging version and this will need to be reviewed against the final proposed plan by the neighbourhood group. In addition the Council is about to publish guidance notes which among other matters contain guidance around the conformity and the Basic Conditions tests. **This guidance contains the policies which the Council considers to be Strategic and which neighbourhood plans are required to be in general conformity with, forming one of the Basic Condition tests. A submission check sheet has also been written bringing together the legislative requirements around the submission of a neighbourhood plan.** We would encourage the review of these guidance notes and check sheets. These will be made available shortly on the Planning Policy web pages of the Council's web site.

Following submission, the council will formally review the proposed plan and submission documents against the required Legal Framework. Once the council is satisfied that this has been followed it will then invoke regulation 16 which consists of publishing the proposed Neighbourhood Plan and seek representations on it from those who live, work or carry on business in the Neighbourhood Area. The Council will also at this period consider nominations and select an independent examiner.

Regulation 14 Corpusty and Saxthorpe Pre Submission Draft consultation

Schedule of Comments.

Consolidated Officers response - Build Heritage and Local Plan Working Party 19 June 2017.

Page and Policy/ Paragraph No	Comment
1	General Pleased to see that many of the detailed comments previously given around structure and policy content have now been taken on board. We recognise that it remains important to the NP group to reflect community aspirations however guidance is clear that Neighbourhood Plans do not seek to duplicate existing statutory and non-statutory policies or seek to introduce non land use planning matters. The council advise that areas of duplication should be reviewed prior to submission
2	General We have previously commented re reference to evidence being included as appendices in the text and policy areas. At this stage as it is considered that it draws attention to these documents as part of the consultation. However going forward much of these evidence appendices will need to be separated out from the plan and be used to inform the basic conditions statements. Other supporting evidence should still be made publically available but sit separate from the plan. Where an appendix is intended to act as a guide, text in the NP should be amended to refer to the guide. All supporting documents need to be available on the Neighbourhood Plan web site.
3	General Conformity – throughout the plan there are references to the Core Strategy, Local Plan and Development Plan of the district. The Neighbourhood Plan is being brought forward ahead of the emerging new Local Plan and although the dates now align, in order to future proof the NP it is recommended that consideration is given to amending text and in places policies so that the reference is to not only to the Core Strategy but its subsequent revision or simply the Development Plan. For example 4.1.1 (2) (f) the plan needs to be in general conformity with the existing strategic policies contained in development plan..... Thus this plan is in accordance with the North Norfolk District Council Core Strategy.... ADD and <i>also has regard to the emerging Plan</i> . Policy H3 - referrers directly to Core Strategy Policy on mix of homes. This policy will be reviewed in the emerging Local Plan. In these circumstances consideration should be given to adding or <i>subsequent revision</i> or simply replace NNDC Core Strategy <i>with NNDC Development Plan</i> . These slight changes and consistency throughout the NP will help future proof the proposed NP when the local plan is adopted.
4	7.1 References to the village envelope need to be replaced with correct terminology – the settlement boundary.
5	7.1 General – the settlement boundary is a policy line that differentiates between policy approaches, proposals that are inside the boundary and those that are outside. The text should be changed to make clear that although the preference is for development to be inside the boundary development outside will be strictly controlled through policies contained in this neighbourhood plan and the districts' development plan – reference to not

		allowing development outside the boundary is an aspiration. Technically development outside the boundary is limited to that which is required for a rural location <i>outside Corpusty and Saxthorpe in conformity with Core Strategy policy SS2 and the text should be amended as such here and elsewhere in the NP for consistency.</i>
6	Overarching policy 1	<p>It is taken that the enlarged settlement boundary is required in order to fulfil the aims/objectives of the plan and community aspirations however there should be clear justification for the preferred option and the rejection of alternative option b. An assessment based on a set of criteria would strengthen the proposed approach.</p> <p>4th bullet – delete. There is no need to reference in the policy that the site has been previously allocated.</p> <p>5th bullet – <u>add minimum of 0.15 hct</u> of open space – conformity with the development plan.</p> <p>5th and 6th bullet are site specific and could be combined into policy three – see notes below</p>
6a	Priority Areas	Consideration could be given to referencing how many dwellings these priority areas could provide. it should not conflict with density requirements detailed separately in the plan
7	7.3 & overarching policy 3	<p>NPPF encourages policies to make effective use of land by re using land that has been previously developed and in para 47 set out their own approach to housing density to reflect local circumstances. This is set in the context of “In order to boost significantly the supply of housing, national planning policy requires local planning authorities to set out their approach to housing density to reflect local circumstances.</p> <p>The district development plan policy Ho7 sets out the strategic approach to density and aligns with the NPPF and the NP should be seeking to be in general conformity with it. The NP correctly identifies that this is a requirement for 30 dph however the NP then seeks to change this policy to a lower threshold of 25. Our previous advice was that any policy wording should seek to align with the overarching policy context and be more general</p> <p>In addition it is taken that this policy is referring to priority sites 1, 2 and 3 rather than over all density. The title of the policy is misleading and should be changed to reflect development requirements of priority areas 1, 2 and 3. In addition and for simplicity this policy could be combined with overarching policy 1 and bullets 5 and 6 of policy 1 should be moved into this new policy – that way all the requirements of priority areas are in one place.</p> <p>Consider the below:</p> <p>New residential development should have a density that is consistent and compatible with the existing prevailing density in the immediate area in order to reflect the local character and appearance. Proposals should respond positively to the existing appearance and character of the immediate neighbouring residential architectural style and type. Buffer planting within defined residential development areas will be encouraged to address and reduce visual impact and landscape issues. Developers will be required to provide suitable public open spaces and provide public access through them.</p> <ul style="list-style-type: none"> - Open space in site 1 should be provided in the north of the site, providing a minimum of 0.15 hts of public open space. - All hedgerows in sites 1 and 2 should be preserved or replaced by appropriate alternative planting <p>Notwithstanding the above point 1 in policy 3 is not a policy but a definition this should be removed</p>

		<p>The remaining points 2 and 4 should be combined into a suitably worded policy as above</p> <p>In addition the supporting text in 7.3 talks about developments following “modern best practice”. Whilst a laudable aim, it is considered that including references to the London Housing Design Guide and to the Parker Morris space standards will not be helpful going forward.</p> <p>The former, whilst containing 41 useful design standards, provides some quite prescriptive requirements which have clearly been heavily influenced by the higher density schemes of the capital. It is therefore questionable whether it really translates into a North Norfolk context, or indeed whether some of the more detailed guidance actually accords with our own amenity criteria and parking standards. If the standard was to be used, It is clearly incumbent on everyone to be familiar with their contents in any decision making. Given the current guide comes in at 171 pages; I’m not sure how realistic this would be in practice. Therefore, despite it offering some commendable direction for developers (particularly in urban areas), the council would question the credibility or influence of it within this district.</p> <p>The latter, meanwhile, whilst hugely influential back in the 1960/70s, dates from a time when development pressures and planning considerations were significantly different. With occupancy expectations having also changed considerably, it is doubtful whether the inclusion of this reference provides any real value.</p> <p>National policy is also clear that when there is a desire in setting local building standards that they are set in a consistent way with the Governments policy and adopt nationally described space standards. (NPPF para 95). To avoid the issue of non-conformity with national policy the council consider that the reference to design standards and the London/ Parker Morris space standards should be removed. Any enactment of space standards would also have to be supported by evidence supporting their requirement.</p> <p>Please see additional commentary on this specific policy requirement on contained in the response to policy H1 below. (comment 8)</p>
8	Policy H1	<p>It is not clear why this policy refers to appendix 13. In the information provided this is a consultation document seeking views on developing a vision. These references should be removed.</p> <p>As previously advised the policy should reference the C& S Design guide and also the NNDC design guide which is part of the development plan</p> <p>Bullet 2 references requirement for archaeological investigations. This is a similar requirement to the NNDC development plan contained in EN8</p> <p>London Housing Design Guide. (please also refer to comment no 7)</p> <p>Notwithstanding the comment above there needs to be greater justification on the requirement for space standards in the first place and then the appropriateness for the London standards to be applied to the rural setting of Corpusty and Saxthorpe followed by an assessment of viability.</p> <p>The council consider that this view has not been adequately explained and</p>

the justification required for the departure of from the nationally prescribed standards contained in the Building Regulations has not been given. These were introduced after the government's 2012 – 2015 Housing Standards Review. **The reference to the requirement should be deleted.**

As previously advised the [Ministerial Statement of March 2015](#) provides clarification on national policy approach and the interpretation of the NPPF para 95. (See section beginning Housing Standards: streamlining the system). This written ministerial statement sets out the government's new national planning policy on the setting of technical standards for new dwellings. The new system comprises new additional optional Building Regulations on water and access, and a new national space standard and collectively called the "the new national technical standards".

We note that previous advice around this has partially been taken on board and references to the requirements for Lifetime home standards have been removed, however It is not clear why the NP has replaced requirement for lifetime homes standard with an approach that is equally not prescribed through national policy. **It is the council's recommendation that this requirement is withdrawn.**

Furthermore the NPPF requires that plan making requires careful attention to viability and that the costs of polices do not place such a scale of obligations on development that viability is threatened. An assessment of the overall cost in relation to this and other "policy burdens" is not included in the supporting evidence to the NP.

In addition the link that is in the policy takes the reader to the interim standards 2010. It is believed these are these are not the full current standards used across London and further clarity would be required requiring which aspects are required along with further consultation where the NP to persist along this route. Since then key standards for the London Housing Guide, have been incorporated into a new London Plan. In 2012 the Greater London Authority published Supplementary Planning Guidance (SPG) and it is understood that this included the full set of standards from the Interim LHDG, retaining the two-tier status but renaming them Baseline and Good Practice standards, however in practice some of the secondary space standards were not applied across private housing and that the SPG also expanded the London Plan to cover over 77 flat and house types and created minimum gross internal floor area requirements for dwellings for those with bedspaces for 1person up to 12 persons. The SPG is understood to have effectively streamlined the three sets of space standards which were previously in existence but produced separately for the National Housing Federation, NHF, Homes and Community Association HCA, and the GLA over the preceding few years, into a single set. However it remains questionable whether it really translates into a North Norfolk context.

Irrespective of this it is considered that it is pre NPPF and predates the Government's 2015 Housing Standards Review and March 2015 Ministerial Statement where local Planning Authorities are advised to restrict the introduction of local standards unless they are the prescribed "new national

		technical standards” detailed in the Building Regulations and the policy approach set out in the march 2015 Ministerial Statement.
8 cont		As in point 5 above - Technically development outside the settlement boundary is limited to that which is required for a rural location. We have previously commented that the council’s development plan sets the policy context for development outside the settlement boundary and that this is a strategic policy which the NP is required to be in conformity with. <i>this section of the policy should be deleted</i>
		<p>The last section of this policy conflicts explicitly with section 7.1 where it states that development will NOT be permitted outside the settlement boundary. See note 5 above. The last bullet is a repeat of Local Green Space and in not required.</p> <p>For simplicity and to avoid confusion of applying this policy it is recommended that this section – bullet 10,11,12,13 are deleted.</p> <p>A separate policy requirement that seeks to limit additional growth of the settlement to 10% of the existing size of the settlements could be introduced (bullet 11&12) however at this stage the council considers that no justification has been provided for this approach and or an explanation as to how the figure of 10% has been arrived at. – How may dwellings would this entail? And how does this fit into the objectives of increasing homes? In addition there needs to be some consideration in how this policy would conform with the NNDC policy SS3 that allows for the flexible provision of dwellings across all 16 service villages</p>
9	Policy H2	The policy is slightly confusing and would benefit from re wording and re structure. The policy mixes up the requirements for affordable housing and technical standards and could be simplified.
	Policy H2	<p>Bullet one - is a duplication of national and local policy and could sit outside the policy box. It also needs to be changed to a positive – affordable housing contributions will be required on schemes of 10 or more.</p> <p>Bullet 4 is also required to stipulate 10 or more and not 11</p> <p>The indented Bullet 2 is not required - delete</p>
		Third bullet (indented) is a policy requirement in its own right and needs to be a main bullet.
		The 4 th bullet should come above the 3rd
		The criteria approach to the requirements for the increased technical standards is welcomed.
		<p>Notwithstanding the above, although the aim of accessible and adaptable homes is generally supported there needs to be a reasoned justification in the text and the requirement and proportions evidenced. As it reads the policy requires adaptable and accessible housing standards to be applied only to affordable housing as that is what the policy is called. WHY? – What about market housing? The policy requires 2 different percentage requirements for M4(2) 20% and 30 % If the intention is to apply a different requirement to market housing then there needs to be reasoned justification and a separate policy outside the affordable housing policy.</p> <p>Although the demographic projections are footnoted in the policy It is considered that further justification is evidenced in the NP or in a specific evidence document and that the technical standards element is separated from the affordable housing policy. A Technical Standards policy could be inserted covering market and affordable housing as long as it can be</p>

	<p>supported and evidenced as to why it is required. Combining the 2 policy areas introduces potential conflict and confusions. The council's advice is to separate out the policy requirements into 2 simple policies covering affordable housing and Technical Standards - as long as the approach is evidenced and there is a justification for it.</p> <p>The strategic policy of the development plan - Core Strategy - HO1 already stipulated that 20% of dwellings should be suitable or easily adaptable – although this pre dates the new Technical standards / Building Regulations options the Neighbourhood Plan policy could seek to conform with this and by adding text clarifying suitable and adaptable now means the new technical standards contained in Building Regulations.</p> <p>It is not clear what the purpose and meaning behind Subsection 4 under bullet 3 which says <i>and the provision of 2 or 3 bedroomed properties reflects the existing mix of houses</i></p> <p>The main aspect of the affordable housing policy is to ensure that the percentage requirement does not fall below 25%. The existing Strategic policy of the Council seeks 50% affordable housing contribution and the policy references this. Affordable housing contributions are negotiated in relation to the complete development plan "ask" the risk with this approach is that : The starting position is reduced to 25% rather than 50% and no viability justification has been provided for this. Although this may mean other monies are available for other obligations such as education contributions etc. it does mean that one of the main aims of the Neighbourhoods Plan which is to increase the quantity of Affordable Housing and increase the availability of housing for young families is potentially compromised by this policy.</p> <p>It is considered that the policy must include reference to a viability assessment to prevent the intended minimum 25% affordable housing requirement becoming the maximum amount that is delivered.</p> <p>The council consider that the percentage of affordable housing required is best evidenced through the Local Plan and emerging Local Plan where additional viability evidence has been commissioned. Never the less if the NP group seek to stipulate a minimum threshold for affordable housing the policy should seek proposals for anything less than the strategic policy requirement to substantiate the affordable housing percentage through a viability assessment in a format suitable to the Council. This requirement should be added to the policy</p> <p>The council's strategic policy H02 also stipulates a site size threshold as well as no of dwellings threshold for affordable housing provision. To remain in conformity the neighbourhood Plan policy H2 should reference these thresholds or the requirement to comply with the Core Strategy policy and subsequent revisions.</p> <p>Consideration should be given to rephrasing the affordable housing policy element along the lines of:</p> <p><i>"On sites of 10 dwellings or more or of XX hectares, 50% of the dwellings shall</i></p>
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		<i>be provided as affordable housing unless a submitted viability appraisal has been reviewed by the Council or their agent and concluded that the scheme is only viable to provide a lower percentage of affordable housing. The aim is that even when there is a viability issue that at least 25% of all dwellings will be provided as affordable housing.”</i>
10	Community Aspiration CA1	<p>The aspiration is noted. The council have previously advise that the statutory provision of housing is implemented through the Choice based lettings scheme and the council’s allocations policy. This is a statutory requirement and will take precedent over the aspiration.</p> <p>The council have previously advised that aspects of this Aspiration have the potential for direct discrimination on the grounds of ethnicity and race. The plan therefor is at risk from failing to comply with the basic conditions. Local connection requirement includes employment where there is an essential or functional need to live close to the place of work in Corpusty parish or an adjoining parish. However, potential occupiers with a protected characteristic of race or ethnicity are more likely to qualify under employment than residence or family connection. Only employment connection includes a need to live in the area. The aspiration should be amended - so discrimination is removed – so delete reference to needing to live in the parish or adjoining parish for work.</p> <p>In relation to a local connection the policy says “Has an essential need to live close to another person, due to a proven age or medical reason (such as essential care)” this does not limit the connection to someone who lives locally but allows anyone from across the country who has a need to provide care to an existing relative. It is too wide a criteria for a local connection and it is considered that the aspiration should refer to an essential need to live close to another person in the parish or adjoining parishes.</p>
11	Policy H3	<p>The policy could be simplified and focus only on the mix and type of housing. In general this is a repetition of policies that are already included in other plans and adds little or no local distinction, other than giving an element of support to bungalows.</p> <p>To be an effective policy the policy needs to stipulate what is required – at the same time as being in conformity with the development plan - currently policy HO.</p> <p>Consider making the requirement to accord with the development plan policies the first bullet and the second bullet replaced with the current first paragraph.</p> <p>The remainder of the wording in the policy does not inform how a proposal should be determined. The reference to the non acceptability of uniform design and the use of the intention to provide characterful development through the reference to the Design guide in Appendix 5 and repeated later in the Neighbourhood Plan is an aspiration and could be re packaged as such. This is also covered in the design section and for simplicity and clarity could be removed from this section.</p> <p>There is the potential for confusion between interpretation of H3 and H2. It is not clear why only a small proportion of bungalows will be accepted when policy H2 requires adaptable properties. A bungalow will generally be</p>

		preferable in meeting these requirements.
11	Policy H4	<p>This policy is a continuation of policy H1 and covers some similar areas. For clarity in interpretation and effectiveness of the Neighbourhood Plan there should only be one policy covering development inside and outside the settlement boundary and policy requirements should not be repeated. Repetition with other policies should be removed. The last section of this policy could be combined with policy H1.</p> <p>Bullet 3 & 4 could refer to other designations, while clarity needs to be given around what is meant by non-greenfield sites.</p> <p>The last section of the policy beginning – <i>outside the settlement boundary windfall housing will only be acceptable</i> Seems to conflict with the 9th bullet point in policy H1 where it states that “<i>development outside the development boundary will not be permitted unless the benefits outweigh any adverse impacts....</i>”</p> <p>Recommended that the approach is simplified to allow interpretation and address potential conflicts between policies and conformity issues.</p>
12	Policy E1	<p>This policy area is covered in the NPPF para 112 /G - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p>Plans should not duplicate other plans</p> <p>The policy requirement is therefore only to provide the Grade 3a/3b assessment.</p>
13	Policy E3	<p>It is recognised that this proposed policy has been amended to reflect previous advice specifically around the existing legislation however The NPPF is explicit in that development must follow the ‘mitigation hierarchy’ (para 118).</p> <p>There is a danger that elements of this policy duplicate the general NPPF policy requirement. Protected species and habitats receive strict protection through various legislation, the plan and policies should not attempt to reproduce these or counteract these laws and policies.</p>
14	Policy E5	<p>Reference to Design policies in Appendix 5 – clarity is sought previous references have been to design guidance.</p> <p>It is considered that you may accidentally introduce a policy that conflicts with your policies on conservative approach to character as carbon neutral and zero carbon houses tend to be on modern design. – How would you like any such conflict to be considered? Some explanation around this issue should be included in the design section.</p>
15	Policy HE1	<p>The requirement of all application within 250m of an existing Historic Environment Record to consult with Norfolk Historic Environment Service is thought to be restrictive. As existing, the LPA does not formally consult the Norfolk HES on any applications, HES service already receive NNDC weekly application list. Currently HES decide what they wish to comment on in accordance with their priorities and available resources. For this reason and</p>

		the fact that HES are not a statutory consultee it is difficult to see how this policy objective would ever come to pass. It is recommended that HSE are specifically consulted for their view on the proposed policy approach.
16	Policy HE2	The policy concentrates on the views of the two churches and fails to recognise the wider issue of ‘setting’ . To be effective the policy should reference the wider setting of the church. See advice contained in Historic England’s note on “Settings and Views of Heritage Assets” which mentions, the historic relationship between places can be equally as important as can environmental factors
17	Design Guidance	<p>It is assumed this section is to provide further guidance on the existing design characteristics of the Neighbourhood Plan Area to inform earlier policy references.</p> <p>Previous advice advised around the potential for this guide to be too restrictive, steering developers towards pastiche reproductions of existing built forms and detailing. No mention of the benefits of good quality contemporary architecture. This could lead to non conformity with the NPPF and strategic policies (EN4).</p> <p>The Council acknowledge and welcome some of the revisions which have been made in response to earlier comments. It is noted that the guidance now includes a reference to carbon neutral and innovative architecture which closer aligns the guidance to the councils design guidance which offers some encouragement to appropriate innovative design.</p> <p>Figure 16 – A minor point but the annotation under the image of Great Yard refers to a “hipped pantile roof”. Surely this incorrect as this row of properties only features gabled roofs. This is also repeated in Appendix 5. Your attention is drawn to the figure used in the NNDC Design Guidance page 26 ref 3.4.9.</p> <p>Paragraph 4.2 The text refers to the NNDC Design Guide but the footnote link directs people to the Government’s housing technical standards (something which is also repeated in Policy DC1 on the following page). It is not clear why this has happened, particularly as no mention is made of the Government guidance within the supporting text. It is recommended that additional text is added around the NNDC guidance and the correct link used. https://www.north-norfolk.gov.uk/section/planning/planning-policy/</p> <p>There remain references throughout the NP to design guidance in the appendices and to that contained in the body of the document. As far as can be seen these remain the same documents and in order to avoid confusion and duplication the NP could choose one place for this guidance to sit.</p>
18	DC1	<p>As above the Foot note is incorrect and should be removed.</p> <p>Policy and or text would benefit from referencing the development plan strategic policies on design as well as the NNDC design guide; however this can be done in the pre text to the policy.</p> <p>Reference to density is a repetition with overarching policy 3 and should be removed from one or the other.</p>

		The policy element does not include reference to the NP design guide or character examples - is this the intention?
19	Policy DC2	The policy is not necessary as it is a reference to national and local policy
20	Policy B1	Add <i>priority</i> Areas 3 - clarity
		It would be helpful if “employment generating “ was defined - The core strategy defines as: Use Class B1, B2 and B8, petrol filling stations, car / vehicle hire, the selling and display of motor vehicles and builders yards. I
		The NPPF test for refusal on highway grounds would be where the residual cumulative impacts of development would be server – see para 32 of the NPPF. As written the policy that calls for applications to be refused due to significant increase in heavy goods vehicles is not in accordance with national policy and could be seen as restrictive.
21	Policy B2	The NPPF states in para 32 that all development that generate a significant amount of movement should be supported by a transport statement or assessment and details what should be included see NPPF para 32. Perhaps this policy should reference the national requirement but add a local requirement around the requirement of the transport assessment to set out how the proposal will seek to minimise conflict with other road uses and maximise safety. See also policy CT5 of the NNDC Development Plan
22	Policy ED2	This policy requires all development to contribute to the library service. This is below the current threshold of 20 dwellings used by NCC. Although this is a local distinction it is recommended that a view is sought directly on this requirement by the responsible authority.
23	W&F1	It is noted and welcomed that this policy has been changed to reflect previous comments around the requirement for consent, however it remains that it is considered that the use of the church is not a land use matter rather a matter for the religious authorities. The first part of this policy should be deleted. The last line of this policy is either missing a word between “by” and “of” or one of these words needs to be deleted. Because the Diocese doesn’t actually work to any formal criteria the Council would favour the phrase “ <i>and they are acceptable to the Diocesan Advisory Committee</i> ” at the end. (We not aware the word “Board” has any meaning within a local ecclesiastic context).
24	T1	NCC are the Highway Authority and advise on highway safety. Matters around highway safety and development proposals will be determined with regard to statutory requirements as determined by the Highway Authority. Contributions as deemed by the parish council should be seen as an aspiration and the policy requirement amended. It should be noted that contributions can only be collected where it is necessary to make a scheme acceptable and that there are “pooling” restrictions around the collection of monies for specific schemes. If the requirement for traffic calming measures have been identified as an issue for the NP to address within the settlement boundary of Corpusty and Saxthorpe then a specific calming scheme could be drawn up (in association with Highways) and detailed in this Neighbourhood Plan. This would be

		adding local distinction and approach through Neighbourhood Planning.
25	T2	In order to assist in future proofing this policy it should refer to the Development Plan rather than the Core Strategy.
26	T3	Why limit contributions to improve bus shelters to proposals of less than 600m from a bus stop. Would it not support the provision of public transport and local facilities if all development were to contribute to improving the public realm especially those in relation to public transport? As previously mentioned the parish council should be aware of “Pooling restrictions” for specific proposals.
27	Sustainability Appraisal	As per previous advice it is considered that the SA remains incomplete and needs more work. It should refer to the full SA framework and review policies against the possible positive, negative and neutral impacts and measure the policies against the SA objectives. It should conclude objectively how each policy performed against the SA objectives. This then helps to demonstrate how the NP policies contribute to achieving sustainable development and will be useful in helping the NP group to fulfil one of the Basic Conditions at submission where it is necessary to demonstrate how the NP contributes to sustainable development.

To assist in the next stages the Council have produced a submission check sheet along with guidance around conformity with the Strategic Policies and other Basic Conditions tests which the final submission neighbourhood plan will have to refer to and which will be tested against. These will be available shortly on the Planning Policy web pages of the Council’s web site

- **Sport England**

From: Planning Central [mailto:Planning.Central@sportengland.org]

Sent: 03 July 2017 15:26

To: 'tony.barnett6@btinternet.com'

Subject: Corpusty and Saxthorpe Draft Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

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 73 and 74. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current

and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

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/>

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.

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.

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.

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

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

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

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

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



Join the conversation #thisgirlcan



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

- **Environment Agency**

From: Abbott, Pat N [mailto:Pat.Abbott@environment-agency.gov.uk]

Sent: 29 June 2017 09:51

To: tony.barnett6@btinternet.com

Subject: Corputsy and Saxthorpe Neighbourhood plan

Hello Tony

Please find our response to the Corputsy and Saxthorpe neighbourhood plan.

Thanks

Pat

Pat Abbott | Sustainable Places Planning Advisor
Environment Agency | Icen House, Ipswich, Suffolk IP9 3JD



Mr. Tony Barnett
Via e-mail

Our ref: AE/2015/118828/02-L01
Your ref: *

Date: 29 June 2017

Dear Mr. Barnett

NEIGHBOURHOOD PLAN - FINAL SUBMISSION: SAXTHORPE AND CORPUSTY

Thank you for your consultation received 7 June 2017 for the Saxthorpe and Corpusty Neighbourhood Plan. We are unable to provide bespoke comments on the neighbourhood plan; however we would like to draw your attention to the following general comments:

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful; they provide:

- an overview of our role in development and when you should contact us;
- initial advice on how to manage the environmental impact and opportunities of development;
- signposting to further information which will help you with development;
- links to the consents and permits you or developers may need from us.

Building a better environment: Our role in development and how we can help:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Environmental Quality in Spatial Planning <http://www.english-heritage.org.uk/publications/environmental-quality-in-spatial-planning-supplementary-files/>

Please also find attached to this e mail our document "Planning for the environment at the neighbourhood level."

Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

We trust this advice is helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pat Abbott', is centered on the page. The signature is written in a cursive style with a horizontal line underneath.

Mr. Pat Abbott
Planning Advisor

Direct dial 0208 4748011

Direct e-mail pat.abbott@environment-agency.gov.uk

- **Dong Energy**

Dear Tony

Thank you for your email pertaining to the Corpusty & Saxthorpe neighbourhood plan.

We have reviewed the draft plan and consider that although several sections are of relevance to the Hornsea Project Three Offshore Wind Farm, the proposed requirements set out within the document align with activities already ongoing as part of the consent application process (i.e. preparation of an ecological assessment and landscape and visual assessment etc. which will form sections within the overarching Environmental Impact Assessment).

Therefore, at this stage, we do not have any specific comments to make in respect to the draft Corpusty & Saxthorpe neighbourhood plan. We thank you for your correspondence on this matter.

Kind Regards

Sarah

Sarah Drljaca

Onshore Environmental Manager
Environmental Management UK
Wind Power

Direct: 0207 811 5841

Mobile: 07787 877442

DONG Energy

From: Tony Barnett [<mailto:tony.barnett6@btinternet.com>]

Sent: 04 August 2017 11:59

To: DONG Energy Hornsea Project Three <HornseaProjectThree@dongenergy.co.uk>

Cc: 'Imogen Waterson' <imogen.waterson@btinternet.com>

Subject: Neighbourhood Plan for Corpusty and Saxthorpe - Regulation 14 Neighbourhood Planning (General) Regulations 2012

Dear Madam/Sir,

We note that you have not availed yourselves of the opportunity to comment on the Corpusty and Saxthorpe Neighbourhood Plan. The consultation period ended at 1700 on 17 July 2017.

We note that the proposed onshore booster station at Little Barningham, occupying an area of up to 25,000 square metres with a height of up to 12.5m, falls wholly or substantially within the Neighbourhood Area. You may inspect the draft Neighbourhood Plan at the Corpusty and Saxthorpe Parish Council website <https://corpustyandsaxthorpeparishcouncil.wordpress.com/community-led-plans-neighbourhood-plans/> and the boundaries of the Neighbourhood Area are exhibited on p.13.

Please acknowledge that you are aware of our interest in this matter.

Yours sincerely,

Tony Barnett

From: Dong Energy [<mailto:dongenergy@dongenergy.dk>]

Sent: 08 June 2017 12:44

To: Tony Barnett <tony.barnett6@btinternet.com>

Subject: RE: Notification of Formal Consultation on the Pre submission Neighbourhood Plan for Corpusty and Saxthorpe - Regulation 14 Neighbourhood Planning (General) Regulations 2012

DONG Energy har modtaget din mail og den er videresendt til rette afdeling.

DONG Energy has received your mail, and it has been forwarded to the relevant department.

Med venlig hilsen – Best wishes



info@dongenergy.comwww.dongenergy.com

From: Tony Barnett [<mailto:tony.barnett6@btinternet.com>]

Sent: 7. juni 2017 19:14

To: Dong Energy <dongenergy@dongenergy.dk>

Subject: Notification of Formal Consultation on the Pre submission Neighbourhood Plan for Corpusty and Saxthorpe - Regulation 14 Neighbourhood Planning (General) Regulations 2012

**PLEASE NOTE THAT YOU ARE
PROPOSING TO UNDERTAKE WORK IN
THE AREA AFFECTED BY THIS
NEIGHBOURHOOD PLAN. PLEASE
READ THE ATTACHED AND SEND US
YOUR COMMENTS**

Dear Madam/Sir or other appropriate form of address,

Notification of Formal Consultation on the Pre submission Neighbourhood Plan for Corpusty and Saxthorpe - Regulation 14 Neighbourhood Planning (General) Regulations 2012

We are formally consulting on the pre submission Neighbourhood Plan for Corpusty & Saxthorpe.
This consultation lasts for a six week period between 5th June 2017 and 17th July 5pm.

We would like your views so as to inform future preparation of the proposed Neighbourhood Plan prior to its submission to North Norfolk District Council and onward for formal examination.

The document is attached to this email and may also be found (together with numerous appendices) on our website at the following URL:

<https://corpustyandsaxthorpeparishcouncil.files.wordpress.com/2015/05/draft-neighbourhood-plan.pdf>

It is also available on the website of North Norfolk District Council at <https://www.north-norfolk.gov.uk/media/3264/corpusty-and-saxthorpe-neighbourhood-plan-pre-submission-version.pdf>

Hard copies may be obtained from: The Planning Department, North Norfolk District Council, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN but please consider the environmental impact before making such a request.

You may also request a print copy and/or send comments on the draft plan via email to: tony.barnett6@btinternet.com or imogen.watson@btinternet.com

Or you may request a copy or send comments by post to:

The Clerk to Corpusty and Saxthorpe Parish Council, Bodgers Field, Norwich Road, Briston, Norfolk, NR24 2BB.

Should you believe that this draft plan may be of interest or concern to any individual, corporate entity, other legally constituted person or agency, we would be most grateful if you were to forward this message and the attached file to such individuals &c to assist us in fulfilling our goal of achieving the widest possible appropriate consultation on the plan.

Yours sincerely,

Tony Barnett

- **Historic England**

Original Message-----

From: Edward.James@HistoricEngland.org.uk [mailto:Edward.James@HistoricEngland.org.uk]

Sent: 26 June 2017 15:12

To: tony.barnett6@btinternet.com

Cc: Natalie.Gates@HistoricEngland.org.uk; Edward.James@HistoricEngland.org.uk;
paul.rhymes@north-norfolk.gov.uk

Subject: Historic England advice on case PL00106712

Dear Tony,

I am writing in relation to the following:

NDP: Neighbourhood Development Plan

Corpusty and Saxthorpe, Norfolk

[Case Ref. PL00106712; HE File Ref. HD/P 5320; Your Reference.]

Please find attached Historic England's response with regard to the above consultation on the Corpusty and Saxthorpe Neighbourhood Plan. Please do get in touch if you have any queries.

Yours Sincerely

Edward James

Historic Places Advisor, East of England

E-mail: Edward.James@HistoricEngland.org.uk

Direct Dial: 01223 582746

We help people understand, enjoy and value the historic environment, and protect it for the future. Historic England is a public body, and we champion everyone's heritage, across England.

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available.

Mr Tony Barnett
Corpusty and Saxthorpe Parish Council

Direct Dial: 01223 582746

Our ref: PL00106712
26 June 2017

Dear Mr Barnett

Re: Neighbourhood Plan for Corpusty and Saxthorpe

Thank you for consulting Historic England about your draft Neighbourhood Plan.

Having considered the proposals we do not consider that there is a need for Historic England to provide detailed advice at this time. However in light of the heritage assets that are in the area, as well as the site allocated for development adjacent to the Grade II listed Manor House, we would

recommend contacting the conservation officer at North Norfolk District Council, who will be the best placed person to assist you in the development of your Neighbourhood Plan. They can help you to consider how the strategy and neighbourhood plan policies might address the area's heritage assets, as well as how best to manage development in the setting of the manor. You can find information on the designated heritage assets in the Plan areas on the National Heritage List for England, on Historic England's website, here: <https://historicengland.org.uk/listing/the-list>, and for further information on locally designated heritage assets and Conservation Areas we recommend you contact the Conservation Officer at North Norfolk District Council.

You might also consider contacting the staff at Norfolk County Council who look after the Historic Environment Record and can give detailed advice on archaeological matters, including how best to manage development in the area that may affect below ground archaeological heritage assets. The staff at the HER should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful, if you have not done so already, to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan. National Planning Practice Guidance is clear that where it is relevant, Neighbourhood Plans need to include enough information about local heritage to guide planning decisions and to put broader strategic heritage policies from your local authority led local plan into action at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions. We recommend that Neighbourhood Plans include a list of designated and non-designated heritage assets in their area, and a map that clearly shows their location.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

Other information on how best to appraise, understand and manage Conservation Areas, as well as undertake Historic Area Assessments to provide a sound evidence base for your neighbourhood plan, can be found here:

HE Advice Note 1 - conservation area designation, appraisal and management:
<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/> (February 2016)

and here:

Understanding Place - Historic Area Assessments: <https://content.historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/heag146-understanding-place-haa.pdf/>. (April 2017)

We recommend the inclusion of a glossary containing relevant terminology contained in the NPPF, in

addition to details about the additional legislation and policy protections that heritage assets enjoy.

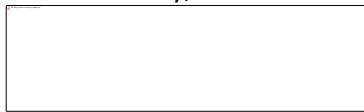
We would also suggest that the NPD provides links to these relevant Historic England documents:

HE Advice Note 2 - making changes to heritage assets: [<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>](https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/)

HE Good Practice Advice in Planning 3 - the setting of heritage assets: [<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>](https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/)

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc: Paul Rhymes, Conservation Officer, North Norfolk District Council

- **Norfolk County Council**

Original Message-----

From: Chamberlain, Naomi [mailto:naomi.chamberlain@norfolk.gov.uk]

Sent: 14 July 2017 15:49

To: tony.barnett6@btinternet.com

Cc: Faulkner, Stephen

Subject: NCC Comments on Corpusty and Saxthorpe Neighbourhood Plan (Reg 14)

Dear Tony,

Thank you for consulting Norfolk County Council on the Corpusty and Saxthorpe Neighbourhood Plan (Reg 14), please find our comments attached.

Best wishes,

Naomi

Naomi Chamberlain

Trainee Planner

Infrastructure and Economic Growth Team

Norfolk County Council

Tel: 01603 638422

Email: naomi.chamberlain@norfolk.gov.uk

**Norfolk County Council Comments on the:
Corpusty and Saxthorpe Neighbourhood Plan (Reg 14)
14th July 2017**

1. Preface

- 1.1 The officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Neighbourhood Plan.
- 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.

2. General Comments

- 2.1 The County Council supports the Vision, Aims and Objectives set out in the Plan (pages 19 - 21). In particular the County Council supports objective 5 supporting local businesses and objective 7 supporting the amenities within the village.

3. Infrastructure Delivery

- 3.1. Under heading 7.4 Detailed Policies (page 42) the following should be included. *“Housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via an s106 agreement / s278 agreement); or use of a planning condition/s.”*
- 3.2. Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development.
- 3.3. Whilst Planning Policy ED2. Travelling Library (page 60) is supported. It is suggested that the “Travelling Library” is renamed as the “Mobile Library” throughout the policy.
- 3.4. Should you have any queries with the above infrastructure delivery comments please call Naomi Chamberlain (Trainee Planner) on 01603 638422 or email naomi.chamberlain@norfolk.gov.uk.

4. Environment

- 4.1 As outlined in the Norfolk County Council Planning Obligations Standards (2017), the scope of the County Council’s green infrastructure team’s comments relate to
- Public Rights of Way
 - Norfolk Trails

- Ecological Networks/biodiversity

The descriptions of the environmental designations are inconsistent throughout the document. The text which references Figure 3 (page 24) 'Environmental designations' refers to 'environmentally sensitive land' (paragraph 6.3.1.) which is incorrect. Figure 3 is of poor quality and has not reproduced well, and it is suggested to be replaced with a readable version. It is believed that figure 3 shows County wildlife Sites or Local sites i.e. areas notified for their importance for biodiversity in a county context, Roadside Nature Reserves (RNRs) which are sections of highway verge identified for their botanical value, Registered Common Land i.e. land as defined in the CRoW Act, Registered Village Green (although this is masked by layers of other designations), and – possibly - Conservation Areas. In the key, there are other designations for which there no sites in the parish and it would help if these were removed.

- 4.2 In Figure 3 there are also areas of land hashed dark green which references 'Environmentally Sensitive Areas'. These areas may have once been areas entered into Environmental Stewardship Agreements (ESAs) resulting in confusion with a very different designation. The ESA scheme has now been replaced by Countryside Stewardship Agreements (CSA), and the boundaries of land within the parish covered by the modern scheme are now very different and cover a larger area. The information is publically available on the Natural England 'Magic' Mapping system (available at: <http://www.natureonthemap.naturalengland.org.uk/>). The situation is further confused as Section 2 and policy 2.2. (page 46), which makes references to Environmentally Sensitive Areas, which it states are 'now known as Agri-environment schemes'. It is suggested that this confusion is addressed in the plan moving forward.
- 4.3 Planning Policy E2: The River Bure and Valley (page 47) refers to 'Green Infrastructure' and it is suggested that a definition is provided as this term can be used to mean several different things.
- 4.4 Planning Policy E3: Protection and Enhancement of Local Biodiversity (page 48) states that hedgerows in the parish are protected by the Hedgerow regulations. However, only hedgerows that meet the criteria in the regulations would receive protection only in certain contexts. It also refers to proposals that may have an "impact on any species or habitats within designated nature conservation areas". It is suggested that this is rephrased to "*adverse impact on any species or habitats within designated nature conservation areas*". And could also be elaborated to include areas outside of designated areas where there is elevated biodiversity interest, and/or where protected species and/or priority habitats and species are present. Additionally, it is also suggested that the policy included the following "*building on County Wildlife Sites, i.e. sites of value for biodiversity in a county context, and should be discouraged.*"

The term 'ecological corridors' in Policy E3 should be defined. And the final paragraph in Policy E3 should be rewritten as it is unclear and unpunctuated.

- 4.5 Policy W&F2: Footpaths (page 63) refers to Green Infrastructure. It also suggests 'permissive paths' should be sought. But it is encouraged that new footpaths should be designated legally as Public Rights of Way as they can therefore continue in perpetuity. Permissive routes are much less permanent, even if secured through condition, and can be closed/lost at any time. Therefore, it is suggested that the "permissive footpaths" wording is removed from this policy and replaced by "Public Rights of Way".
- 4.6 Should you have any queries with the above environmental comments please call Dr David White (Senior Green Infrastructure Officer) on 01603 222058 or email david.white.etd@norfolk.gov.uk.

5. **Lead Local Flood Authority**

- 5.1. The County Council considers that the following policy should be inserted into the neighbourhood plan;

5.2. **POLICY: FLOODING/DRAINAGE**

The Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.

Any new development or significant alteration to an existing building within the Corpusty and Saxthorpe area should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:

- Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.
- Have a neutral or positive impact on surface water drainage.

Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as:

- Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).
- Where appropriate undertake sequential and /or exception tests.
- Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.
- Inclusion of appropriate allowances for climate change
- Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.
- Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.
- To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield

as possible) surface water runoff rates and runoff volumes within the development site boundary.

- Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.

5.1 Should you have any queries with the above comments please email the LLFA at llfa@norfolk.gov.uk.

6. Transport

6.1 Norfolk County Council as the Highway Authority appreciates the inclusion of the transport policies in the neighbourhood plan.

6.2 The reference in Planning Policy T1. Traffic Calming (page 65) suggests that the Parish Council can dictate the traffic calming measures in the village. However, this responsibility is that of the County Council. Therefore, Planning Policy T1. Traffic Calming should be re-written to exclude the statement “*where the Parish Council deems it necessary*”.

6.3 Planning Policy T2. Car Parking (page 65) is mostly acceptable. However, on-street car parking cannot be attributed to traffic calming measures. Therefore, the sentence “*if this results in safe on-street car parking which acts as an informal traffic calming scheme*” should be removed from the policy.

6.4 Should you have any queries with the above transport comments please call Richard Doleman (Principle Planner) on 01603 223288 or email richard.doleman@norfolk.gov.uk

7. Historic Environment

7.1 The Historic Environment Service is pleased to see the historic environment considered throughout the pre-submission consultation plan. This draft plan contains sections on the history, landscape, archaeology and historic buildings of Corpusty and Saxthorpe (including the foreword and pages 50-51). Importantly it includes the historic environment in the vision statement (section 5), aims (aim 2, sections 6.1 and 6.1.2) and objectives (theme 2 and objective 3, section 6.2). The policies/objectives for archaeology and views of the church on pages 50-51 are very welcome.

7.2 Although the historic environment is considered within the plan, it appears the collection of baseline information did not use all the sources recommended by Historic England’s published guidance on the preparation of Neighbourhood Plans (<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>). This document encourages the full consideration of heritage assets and suggests ways in which this can be achieved. These ways include those responsible for preparing the plan directly consulting the relevant Historic Environment Record and local authority historic environment advisers, something that does not seem to have happened during the preparation of the

draft plan. Although the Norfolk Heritage Explorer website (an edited version of the Norfolk Historic Environment Record) has been used, it is not suitable for use in the planning process, something that is explained on its front page (<http://www.heritage.norfolk.gov.uk/>). Figure 6 is taken from the Norfolk Heritage Explorer website, without the necessary copyright permission being in place and should be removed, as the Norfolk Heritage Explorer is not suitable for use in the planning process, Norfolk County Council would not grant copyright permission to include it.

- 7.3 The authors of the draft plan may wish to undertake further work to ensure it meets Historic England's published advice. If they chose to undertake this work, it could include the steps listed below:
1. Study Historic England's published guidance and consider how the plan can take its advice on board.
 2. Contact the Norfolk Historic Environment Record and request information on heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk.
 3. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration.
 4. Directly consult the Historic Environment Service's planning advice team (hep@norfolk.gov.uk). Advice can be provided on which heritage assets are most significant and ways in which they can be protected and enhanced. Also, advice can be given on the wording of planning policy HE1, which although very welcome, could be beyond the capacity of the Historic Environment Service to fulfil.
- 7.4 Should you have any queries with the above comments please call David Robertson (Acting Senior Historic Environment Officer) at 01603 869291 or email david.robertson@norfolk.gov.uk.

- **Bidwells**

From: Karen Tee [mailto:Karen.Tee@bidwells.co.uk]

Sent: 13 July 2017 12:05

To: tony.barnett@btinternet.com; imogen.watson@btinternet.com

Cc: Aimee Fowler

Subject: Response to the Formal Consultation on the Pre-Submission Neighbourhood Plan for Corpusty and Saxthorpe

Email sent on behalf of Aimee Fowler

Att: Mrs Cotgrove, Corpusty & Saxthorpe Parish Council

Please find attached letter relating to the above formal consultation. Bidwells continue to be appointed by the landowners of the two sites known as 'Site 1' and 'Site 2' – Land off Norwich Road, Corpusty which are included within the pre-submission consultation version of the Corpusty and Saxthorpe Neighbourhood Plan 2017-2036 (June 2017). This letter comes in addition to our previous consultation response sent on behalf of the landowners, sent to you and dated 26th April 2017.

Please do contact us if you require any further information.

Kind regards

Aimee Fowler

Principal Planner

DD 01603 2296407



Karen Tee

Secretary/Office Manager, Planning

16 Upper King Street, Norwich, Norfolk. NR3 1HA

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Your ref:
Our ref: 35931
DD: 01603 229407
E: aimee.fowler@bidwells.co.uk
Date: 13 July 2017

Corpusty & Saxthorpe Parish Council
c/o: Mrs K Cotgrove (Parish Clerk)
Bodgers Field
Norwich Road
Briston
Norfolk
NR24 2BB

Email and post

Dear Mrs Cotgrove

RESPONSE TO THE FORMAL CONSULTATION ON THE PRE-SUBMISSION NEIGHBOURHOOD PLAN FOR CORPUSTY & SAXTHORPE – REGULATION 14 NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

Bidwells continue to be appointed by the landowners of the two sites known as ‘Site 1’ and ‘Site 2’ – Land off Norwich Road, Corpusty, which are included within the pre-submission consultation version of the Corpusty and Saxthorpe Neighbourhood Plan 2017-2036 (June 2017). This letter comes in addition to our previous consultation response sent on behalf of the landowners, sent to you and dated 26th April 2017.

Both sites continue to be included within the current pre-submission version of the Neighbourhood Plan, and likewise, the landowners continue to support their identification. We confirm on behalf of the landowners that both sites are suitable, available and deliverable for future development.

Sites ‘1’ and ‘2’

Both sites ‘1’ and ‘2’ continue to feature as priority development areas within the Neighbourhood Plan and have been selected as appropriate for infill development within the Plan, as well as providing much-needed housing supply within the North Norfolk District. Whilst specific detail of each of the sites has been removed from the Plan, the Plan still continues to state the sites’ basic suitability for development within the existing settlement of Corpusty. We note that an area of public open space has been designated over the existing ‘Orchard’ located within the site boundaries to reflect the designation within the current North Norfolk District Council site allocation. A point of detail is that the open space is not an Orchard, what is left of that is behind the Claxton’s Bungalow. The space is best described as being at the north end of the site. Although we agree for the provision of some form of public open space (to be in accordance with Local and National Guidelines), we believe that the provision for public open space on the site(s) should be more fluid and not fixed to one particular area of the site. As part of the site layout and design, a series of basic opportunities and constraints would need to be explored, including exploring technical aspects such as ecology, archaeology and utilities etc. By specifically stating here that public open space is to be located, is considered too restrictive and should be adapted to allow greater flexibility on location within site 1. We believe that public open space plays an important part in the development of a site and the future design and layout of the sites will encompass the best location for public open space, which we believe may not be in the location of the “Orchard” as it is shown in the Plan.

In addition to the above, we note that the site area for site '2' is not reflective of the entire site area as submitted under the North Norfolk Emerging Local Plan Call for Sites Consultation (plan ref: H0041) (see attached submission plan). The small field adjacent to Site 2 is seemingly omitted in the Neighbourhood Plan Figure refs: 11 and 13. We believe these should be consistent to those in the North Norfolk District Council Emerging Local Plan Consultation papers and documents.

In addition to the above, and in response to the latest proposed planning policies, within the pre-submission version of the Neighbourhood Plan, we have again, considered these and comments are set out below where relevant to the development of Site 1 and 2:

Planning Policy H1 – Scale and Location of New Residential Development

The draft Policy refers to the London Housing Design Guide (Interim Edition). We are supportive of this and believe it is reflective of the shift toward modern and sustainable housing design.

Planning Policy H2 – Affordable Housing and Planning Obligations

Draft Policy H2 continues to state the provision for affordable housing should be at least 25% for developments of 11 or more dwellings. Whilst we continue to be supportive of this, we also believe that the type and tenure of affordable housing should be assessed at the time of the submission of a planning application, whereby local need can be accurately assessed and considered against potential issues of viability in the event whereby 25% affordable housing is not considered viable, we consider that this percentage should be reviewed and potentially reduced if necessary. The updated Planning Policy H2 also makes reference to the provision for developments less than 10 dwellings do not need to provide affordable housing. We also support this policy provision and believe that this update is reflective of Central Government Legislation changes and movements. Likewise, we suggest that this Policy should include the provision for Starter Homes within the definition of Affordable Housing.

Planning Policy H3 – Mix and Type of Housing

We continue to support this draft Policy and place great importance on the need for new developments to be reflective of the local character and housing need.

Planning Policy H4 – Further Housing within the Settlement Boundary

The updated draft policy now includes – “...*(the) rhythm and character of the street and is consistent with the existing form and character of surrounding buildings.*” We are supportive of this addition and believe that any new development should be in keeping and reflective of the existing character of the surrounding area.

Planning Policy DC1 – Overall Character

The updated draft Policy now states the provision for the acceptability of a density of up to 25 dwellings per hectare. We are supportive of this increase in density, however, we do also believe that any future development should be reflective of the surrounding character, as well as being a viable scheme. In the instance that a scheme is not viable, based on any site constraints and based on 25 dwellings per hectare, the development should be increased to a more suitable density figure, whilst still ensuring it is reflective of surrounding character through means of design.

Planning Policy DC2 – Open Space

The updated policy makes reference for Open Space provision to be in accordance with the Local and National Guidance. We support this and further to previous comments within this letter, place great importance on the placement and integration of public open space within the development of the site(s).

Planning Policy T1 – Traffic Calming

The updated draft policy states the provision for traffic calming infrastructure to be constructed in the best interests of highway safety. Any future residential development of Site 1 and 2 will ensure that proper

consideration and implementation of highway safety is considered as part of any future planning application. This would likely be undertaken as part of supporting highways assessments and road layouts. Likewise, Norfolk County Highways would also be consulted as part of the statutory planning process.

Planning Policy T3 – Public Transport

The updated draft Policy states that any new developments within 600m of a bus stop, that provide access to a bus service enabling journeys to work or education at peak times, will be considered favourably. Likewise, any new developments should be expected to upgrade, where necessary, the nearest bus stops to make them more attractive to use and more accessible. Whilst we believe it is important for new developments to have sustainable access to public transport, these would be addressed by way of a supporting Highways Assessment which would be submitted with any future Planning Application. The upgrade to any Bus Stop would also be at the discretion of the Norfolk Highways Department and secured by legal obligations.

We continue to be active in the process of promoting the two sites on behalf of the landowner(s) and we would be grateful if you would keep us informed on any progress relating to the development of the Corpusty and Saxthorpe Neighbourhood Plan moving forward and prior to formal adoption.

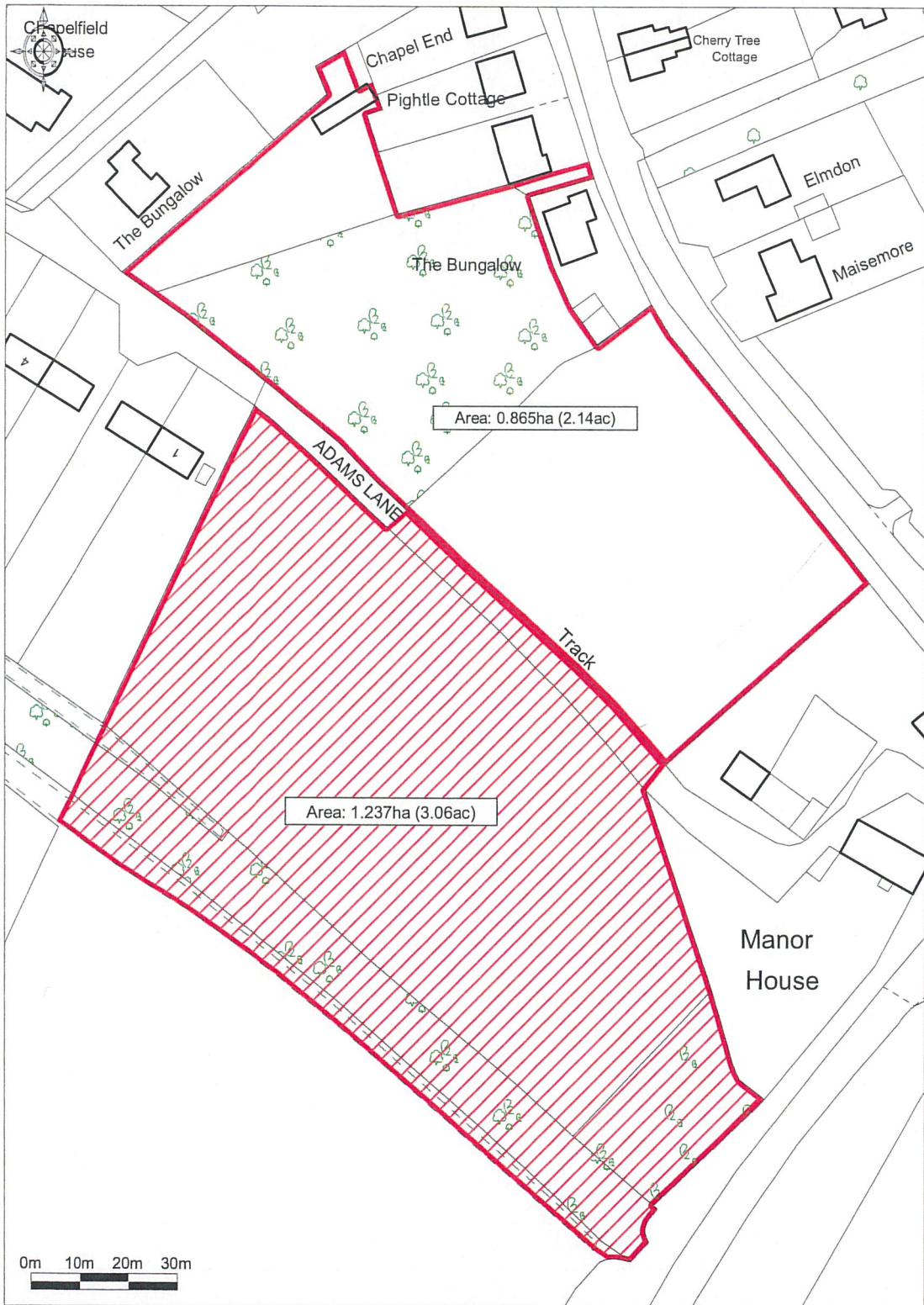
Yours sincerely



Aimee Fowler
Principal Planner

Copy Tony Barnett
Imogen Waterson

Land off Norwich Road, Corpusty



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