

Corpusty & Saxthorpe Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Corpusty & Saxthorpe Parish Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed.

Please fill in your contact details below:

Personal Details			
Title: Mr	Name: Stewart Patience		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input checked="" type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	
Organisation Name (if responding on behalf of your organisation) Anglian Water Services Ltd			
Address: Thorpe Wood House, Thorpe Wood, Peterborough			
Postcode: PE3 6WT			
Telephone: 07764989051		Email: sPatience@anglianwater.co.uk;	

Please note: all responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available. Any other personal information provided will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 and will not be made available on our website. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#).

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation would be necessary.

Future Notification & Next Stages

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Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planninpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, Norfolk, NR27 9EN. **Representations must be received no later than 5pm Monday 6 August 2018. Late representations may not be accepted.**

Signature:

Print Name:
Stewart Patience

Date: 6th August 2018

For official use only

Date received:

Ref No:

Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so you may wish to address whether or not the draft neighbourhood plan meets the basic conditions and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

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Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Overarching Policy 1: Framing Provisions	Object (in part only)	<p>We note that three sites are identified as the focus for residential or mixed use development within the plan area. However the scale of residential or mixed use development is not specified within the Neighbourhood Plan.</p> <p>Anglian Water would be able to comment further on the implications of these sites for the existing water supply and foul sewerage networks when the scale of residential development is known.</p> <p>Reference is made to all sites taking into consideration existing sewage capacities which is welcomed. We would suggest that Policy 1 should be amended to make it clear that applicants would provide information at the planning application stage to demonstrate that capacity is available or could be made available in time to serve the development.</p>	<p>'3. All sites should take into consideration existing sewage capacities and demonstrate that capacity is available or can be made available in time to serve the development'.</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change

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Please use additional rows / additional sheets of paper to add further comments.

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Please fill in your contact details below:

Personal Details			
Title: Mr	Name: Darren Cogman		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	Agent, representing Elizabeth Askew, Judith James and the Wilson family.	
Organisation Name (if responding on behalf of your organisation) Bidwells			
Address: 16 Upper King Street, Norwich, Norfolk			
Postcode: NR3 1HA			
Telephone: 01603 229408		Email: darren.cogman@bidwells.co.uk	

Please note: all responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available. Any other personal information provided will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 and will not be made available on our website. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#).

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No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation would be necessary.

Whilst we do not consider that an oral examination is necessary, we reserve the right to participate should matters arise from this consultation that result in the Examiner deciding that an oral examination is required.

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Please notify me

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Signature:

Print Name: Darren Cogman

Date: 6/8/18

For official use only

Date received:

Ref No:

Representation Details

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Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
p.39-42 inc. , 6.3 Overarching Policy 1, inc. Figures 16 and 17.	Support	Bidwells welcomes the supporting text and in particular the proposed extension of the settlement boundary as it facilitates appropriate infill development to meet a part of the identified housing needs, as shown within Figure 16. This will provide much needed housing, including for young families and new families that will assist in supporting and sustaining local businesses and the Primary School.	No change.
		Bidwells also welcomes the priority development areas identified in Figure 17 (Priority Development Areas 1 and 2) as entirely appropriate, sustainable, infill development.	No change.
		In essence, Bidwells considers that the Corpusty and Saxthorpe Neighbourhood Plan meets the five “basic conditions” as explored further in the Corpusty and Saxthorpe Basic Conditions Statement that supplements the Neighbourhood Plan.	

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Personal Details			
Title: MRS. MR.	Name: +	PRIVATE INDIVIDUALS	
Please tell us the capacity in which you are commenting on the Plan:			
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I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	
Organisation Name (if responding on behalf of your organisation)			
Address: [REDACTED]			
Postcode: [REDACTED]			
Telephone: [REDACTED]		Email: [REDACTED]	

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		<p>We both fully support the plan as presented.</p> 	

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Signature: 

Print Name: 

ANA

Date: 26.7.2018

For official use only

Date received:

Ref No:

North Norfolk
Holt Road
Cromer
Norfolk
NR27 9EN

Our ref: AE/2018/122972/01-L01
Your ref: Copusty and Saxthorpe
Date: 06 August 2018

Dear Sir/Madam

NEIGHBOURHOOD DEVELOPMENT PLAN FOR CORPUSTY & SAXTHORPE PARISH (THE “CORPUSTY & SAXTHORPE NEIGHBOURHOOD PLAN”):

Thank you for your letter dated 7 June 2018 relating to the Corpusty and Sathorpe Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.

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 explain our role in in the planning process in more detail and describe how we work with others; 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.

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/>

Flood Risk

We are aware that Corpusty and Saxthorpe has a history of flooding and parts of the town are at risk of fluvial flooding from the River Bure according to our flood maps. We are investigating this source of flooding and whether there are ways of reducing this risk in the coming years. As part of this work we are currently updating the flood modelling and mapping for the River Bure. We will be looking to work closely with the community and for the community to inform this investigation.

We are pleased to see that the plan discusses the fluvial flood risk from the River Bure. You should be aware that North Norfolk Council have recently undertaken a Strategic Flood Risk Assessment (SFRA) of all sources of flooding across the district in order to inform their Local Plan. It would be useful to make reference to this document in the Neighbourhood Plan as it provides a good summary of flood risk in the district. The SFRA includes a number of maps of the flood risk to the area and is available on the council's [website](#).

Flood Maps

We note that maps of our Flood Zones have been included within the Neighbourhood plan. It should be noted that we believe the labelling for Figure 7 and 8 is the wrong way round. Figure 7 shows Flood Zone 3 which is the high probability Flood Zone containing land assessed as having a 1 in 100 or greater annual probability of river flooding (shown as dark blue on the flood map). Figure 8 shows Flood Zone 2 which is the medium probability zone containing land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (shown as light blue on the flood map).

Figure 16 shows the potential new development areas approved by the community in Corpusty and Saxthorpe. We are pleased to see that the more vulnerable developments have mostly been proposed outside of the Flood Zones and more water compatible uses such as the village green have been designated in areas that are at risk. This is secured in Overarching Policy 2. We are also pleased to note that Planning Policy E1 aims to conserve and enhance the River Bure valley.

Sequential Testing

One of the proposed additions to the residential area in Figure 16, denoted in orange, appears to be located partially within the Flood Zones. The western most site near Little London Farm includes a section of Flood Zone associated with the River Bure and one of its tributaries. However we understand that the priority development areas which will be taken forward by the plan are detailed in Figures 17 and 18. Both of these sites are wholly located within Flood Zone 1 outside of Flood Zone 2 and 3.

Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site.

Should any development be proposed within Flood Zones 2 and 3, the applicant will need to undertake a site specific Flood Risk Assessment (FRA) to support their application, in line with the National Planning Policy Framework (NPPF) and its [Planning Practice Guidance \(PPG\): Flood Risk and Coastal Change](#). Further guidance

on when a FRA is required can be found on our [website](#).

Web Links

Section 3 of the plan provides links to various websites for developers. Under the Environment Agency section there is a link to the English Heritage webpage in error. Instead, you may wish to use the following link which displays our flood map for planning, which may be useful to potential developers: <https://flood-map-for-planning.service.gov.uk/>. The links above referring to the NPPF, PPG and FRA's may also be useful to include.

Surface Water Flooding

Section 6.2.1 (v) states that any application made for development purposes will be required to demonstrate that it meets the requirement of Norfolk County Council with regard to flooding and drainage. It should be noted that Norfolk County Council are the statutory consultee for surface water flood risk only. We are the statutory consultee for flooding from rivers and the sea so both parties may be consulted by the council.

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 faithfully

Miss Natalie Kermath
Planning Advisor

Direct dial 02077141064

Direct e-mail natalie.kermath@environment-agency.gov.uk

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

Planning Policy Team
North Norfolk District Council
Holt Road, Cromer
Norfolk
NR27 9EN

By email only to: planningpolicy@north-norfolk.gov.uk

06th August 2018

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Corpusty and Saxthorpe Neighbourhood Plan (CSNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

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

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.

Paragraph 214¹ of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this consultation, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2012.

National Planning Policy Framework and Planning Practice Guidance

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

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

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

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

¹ National Planning Policy Framework, paragraph 214

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the CSNP's ability to meet basic condition (a), (d) and (e) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The adopted development plan relevant to the preparation of the CSNP is the North Norfolk Core Strategy (NNCS) adopted in 2008 with minor updates being made to the Core Strategy in 2012. In addition, the Development Plan also comprises of the Site Allocations Plan which was adopted in 2011 and identifies land to meet the requirements set in the adopted Core Strategy.

It must be noted that the Council is preparing a new Local Plan to meet the requirements of the Framework. The new Local Plan will provide the planning policy context for development across the whole of North Norfolk for the period 2016 – 2036. The new Local Plan is progressing efficiently, and a Final Draft Local Plan is expected to be out for public consultation in Autumn 2019. It is therefore important that the CSNP allows for flexibility and adaptability, so it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the CSNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

'If to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached or published (as the case may be)

Corpusty and Saxthorpe Neighbourhood Plan

Gladman are concerned with numerous references in the NDP to permitting and not permitting development. We would like to take this opportunity to remind the Parish Council that it is not within the remit of a Neighbourhood Plan to determine planning applications, and as such where reference is made in the plan to 'permitting' or 'refusing' development, Gladman suggest that the wording is amended to read 'supported' or 'not supported'.

Overarching Policy 1 – The New Village Settlement Boundary

Gladman object to the use of settlement boundaries if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of a settlement boundary to preclude otherwise sustainable development from coming forward does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).

Should the council wish to progress with the introduction of settlement boundary regard should be had to policies SS1² of the NNCS which states; 'Land may be identified in or adjacent to these settlements to provide for new development'. Therefore, for the settlement boundary policy to be in conformity with the adopted Local Plan it should be significantly more flexible and sustainable development adjacent to the settlement boundary should be considered. The issue regarding settlement boundary designations have been considered in Examiner's reports, we highlight the Examiners Report³ in to the Godmanchester Neighbourhood plan which states;

'limiting new development to "within the settlement boundary" could prevent new housing development, even of a moderate or minor scale'

Consequently, the Inspector concluded the following;

'Nevertheless, in my opinion, Policy GMC1 should be modified to state that "Development...shall be focussed within or adjoining the settlement boundary as identified in the plan'

Overarching Policy 2 – Local Green Space

Overarching Policy 2 seeks to designate 2 parcels of land as Local Green Space.

The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that of Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation.

The previous Framework was explicit in stating at paragraph 77 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

Whilst some evidence is contained within appendix 15, and not appendix 17 as stated in the draft plan, we do not consider the evidence to be robust enough to justify the designation of all of the identified sites as Local Green Space. We suggest that the Parish Council revisit this policy and ensure that sufficient evidence is provided to demonstrate consistency with the requirements of the Framework.

Beyond this, the policy in its current draft form lacks the clarity and precision that is required to form a practical framework from which decisions can be made. The supporting text to the policy refers to both figure 15, a map of public footpaths & bridleways in the Neighbourhood Area, and appendix 17 the Strategic Environmental Assessment Screening Opinion. We recommend the supporting text is edited to ensure the correct evidence is referred to.

² North Norfolk Core Strategy, SS1

³ <https://www.huntingdonshire.gov.uk/media/2780/godmanchester-neighbourhood-plan-examiner-final-report.pdf>

Overarching Policy 3 – Residential Density

Gladman are concerned that overarching policy 3 seeks to set residential density of 25 dwellings per hectare, despite recognising in the supporting text that the NNCS identifies a minimum threshold of 30 dwellings per hectare. 25 dwellings per hectare seems unnecessarily low and consideration should be had to paragraph 58 of the Framework which states '*planning policies and decisions should aim to ensure that developments optimise the potential of the site to accommodate development*'. To ensure general conformity with the Local Plan the threshold in the CSNP should be modified to 30 dwellings per hectare to ensure the NDP aligns with the overarching policies of the NNCS.

Policy H1 – Scale and Location of New Residential Development

Policy H1 lists 6 criteria that all residential development will be expected to adhere to. We are particularly concerned with criterion 5 of the policy which refers to the 'London Housing Design Guide' and the 'Parker Morris Space Standards'. The London Housing Design Guide contains overly prescriptive requirements which are influenced by the unique characteristics of the urban areas of London. To apply these requirements to the distinctly rural area of Corpusty and Saxthorpe could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that:

"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles".

Consequently, we suggest the reference to the London Housing Design Guide and the Parker Morris Space Standards are removed from the policy.

Further to this, we would like to remind the Parish Council that it is not within the remit of a neighbourhood plan to determine planning applications. Consequently, the text following bullet point 6 should be modified to ensure any reference to permitting development is amended to read 'supported' or not 'supported'.

Policy H2 – Housing and Planning Obligations

Bullet points 1 through to 3 of policy H2 are a continuation of NNCS affordable housing policy HO2. The revised Framework makes clear in paragraph 16⁴ that '*plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...*'. Accordingly, there is no need to repeat a policy already set out in another development plan document and we suggest that this element of the policy is removed.

Further to this, bullet point 4 reads as a technical housing standard and its position within what is effectively an affordable housing policy is confusing. We suggest the introduction of a standalone policy relating to 'building regulation requirements' to help avoid confusion. Further to this we note two thresholds have been put forward in relation to Building Regulations Requirement M4(2), 20% of units and 30% units. To ensure the policy is clear, concise and precise we suggest the figure of 20% is used to ensure conformity with NNCS Policy HOU1 which stipulates; '*On schemes of five or more dwellings at least 20% of dwellings shall be suitable or easily adaptable for occupation by the elderly, infirm or disabled.*'

When seeking to apply the optional standard for accessibility, it must be remembered that the Government has not made this a mandatory standard and therefore it is not considered necessary for all homes to be built to part M4(2). Therefore,

⁴ NPPF July 2018 paragraph 16

in order for the Parish Council to be able to include such a requirement within the CSNP, appropriate evidence and a viability assessment must be provided. Without these documents we suggest this policy should be deleted.

Policy E1 - Agricultural Land

This policy does not accord with the Framework and should be modified to support this flexible approach. The Judgment in *BT&W Vs. SSCLG and Gladman Developments Ltd. [2016] EWHC⁵* concludes that Paragraph 112 of the Framework, regarding best and most versatile agricultural land (BMV), cannot be characterised as a policy which indicates that 'development should be restricted' within the context of Paragraph 14 of the Framework (and the associated footnote 9).

Gladman consider that the implications of the Judgment apply equally to the decision-making process and the plan making process. It confirms that there is not a prohibition on the development of BMV agricultural land, nor a restriction on its development in principle. The location of a site on BMV agricultural land should not therefore automatically result in its removal from consideration for development. Development should be sought to be directed towards areas of lesser environmental value where available, but this does not rule out development of development of BMV agricultural land.

Policy E3 – Protection and Enhancement of Local Biodiversity

Policy E3 states that all development should protect and enhance the biodiversity of the Parish, and where proposals may impact on any species or habitat should be accompanied by an ecological assessment and mitigation measures

Paragraph 113 of the Framework refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. As currently drafted, Gladman do not believe this policy fully aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.

Policy D1 – Overall Character

Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone.

Reference is again made to the development density of up to 25 dwellings per hectare. As set out above in our response to Overarching Policy 3, this should be modified to align with the NNCS figure of 30 dwellings per her hectare.

Policy D2 – Open Space

Policy D2 is unnecessary, adds no further information to that already contained within National and Local Guidelines, and is best deleted to ensure the CSNP does not duplicate policies from other development plans.

⁵ Borough of Telford and Wrekin [2016] EWHC 3073 (Admin), Lang J

Policy D3 – Safety

Whilst noting the intentions of the policy, the text is not clear and fails to portray whether this is a policy requirement or rather a community aspiration. We suggest the installation of sprinklers in all new developments is a 'Community Aspiration' and not a policy requirement and should be reflected so in the CSNP.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CSNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a), (d) and (e). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Andrew Collis
a.collis@gladman.co.uk
Gladman Developments Ltd.



Historic England

By e-mail to:
Planning Policy Team
North Norfolk District Council

Our ref: PL00106712
Your ref: n/a
Date: 17/07/2018

Direct Dial: 01223 582746
Mobile: 07833 718273

Dear Planning Policy Team,

Ref: Corpusty and Saxthorpe Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 22 June 2018 inviting Historic England to comment on the Regulation 16 Submission version of the Corpusty and Saxthorpe Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout. Aside from congratulating those involved, we do not wish to provide detailed comments at this time. We would refer you to our previous advice submitted at Regulation 14 stage, and for any further information 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/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district 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 NP, where we consider these would have an adverse effect on the historic environment.

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

Yours sincerely,

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



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



I have read through the Corpusty and Saxthorpe Neighbourhood Development Plan and thoroughly endorse its main objectives, which I think will be highly beneficial for the community.

One of the NDP's core purposes is to consider how and where new housing should be built, in line with Saxthorpe and Corpusty's designation as a 'service village' by North Norfolk District Council. It is promising that the number of houses being considered is not so large as to compromise the intimacy of a community with only 670 residents, but that new housing is nonetheless being prioritised, in recognition of the fact that to keep the village alive and thriving it needs to attract young people and families through affordable, well-built housing and crucially - as the NDP notes - the availability of rentable properties. Norfolk has a serious problem of demographic imbalance in its rural communities - indeed I note that the 18-35 age group in Corpusty and Saxthorpe is extremely small. Therefore, ensuring appropriate housing is available to new, young residents is paramount for ensuring the long-term wellbeing of Corpusty and Saxthorpe.

It is vital that local people have been - and continue to be - consulted on where new developments are situated. That local people have been included at each stage of the NDP process is encouraging - this is how community politics ought to be done: *with* people, not *to* people. For instance, I fully endorse the NDP's respect for local people's wishes regarding the protection of land around the Village Hall.

The NDP acknowledges the challenges of ensuring employment opportunities in the local area. I endorse the inclusion in the NDP of the aim of creating a 'business area' to the north of the village that would encourage the growth of small businesses, as called for by local residents.

I note that the NDP highlights the very poor public transport connections to Corpusty and Saxthorpe. The NDP rightly notes that improving public transport infrastructure is crucial for increasing employment opportunities but that it largely falls outside its remit. As local Councillor for Corpusty and Saxthorpe I call on the County Council to consider the likely growth in size and professional demographic of villages like Corpusty and Saxthorpe in the coming decade, and to prioritise them in any future public transport reviews which would extend services to rural communities.

I strongly endorse the NDP's focus on environmental protections and, in particular, its mention of possible investment in community projects for renewable energy and insulation schemes. I also support the incorporated protections for existing green spaces.

I note that the NDP acknowledges speeding to be a serious problem in and around Corpusty and Saxthorpe and that the community is in communication with Highways about the implementation of speed-reduction measures such as traffic-slowing devices in the centre of the village and the creation of a 20MPH speed limit. The problem has been raised with me on a number of occasions by local residents and I support the inclusion of speed-reduction measures in the NDP.

- Steffan Aquarone, County Councillor for Melton Constable division

Chris Brown

From: Stakeholder (MMO) <stakeholderMMO@marinemanagement.org.uk>
Sent: 25 June 2018 14:44
To: Planning Policy
Subject: RE: Corpusty & Saxthorpe (Submission Version) Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Completed

Thank you for including the MMO in your recent consultation submission. Please remove stakeholder@marinemanagement.org.uk from your database and address further communications to consultations.mmo@marinemanagement.org.uk.

The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are

adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
 - The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
 - The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
 - The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.
- The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

Kind regards,

Her Majesty's Government – Marine Management Organisation
Lancaster House, Hampshire Court, Newcastle upon Tyne, NE4 7YH
Tel: 0300 123 1032
Fax: 0191 376 2681
Web: www.gov.uk/mmo
Twitter: @the_MMO
Facebook: /MarineManagementOrganisation

Planning Policy
North Norfolk District Council
Holt Road
Cromer
NR27 9EN

Hannah Lorna Bevins
Consultant Town Planner

Tel: 01926 439127
n.grid@amecfw.com

Sent by email to:
planningpolicy@north-norfolk.gov.uk

29 June 2018

Dear Sir / Madam

**Corpusty and Saxthorpe Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

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 our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.

National Grid has identified the following high-pressure underground gas pipelines as falling within the Neighbourhood area boundary:

- **FM04 - Bacton to Gt Ryburgh**
- **FM27 - Bacton to Kings Lynn**



From the consultation information provided, the above underground gas pipelines does not interact with any of the proposed development sites.

Gas Distribution – Low / Medium Pressure

Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@cadentgas.com

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection (plantprotection@nationalgrid.com).

Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

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

Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

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

Yours faithfully

[via email]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Date: 07 August 2018
Our ref: 250485
Your ref: 25062018



planningpolicy@north-norfolk.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

**Planning consultation: neighbourhood plan
Location: Saxthorpe and Corpusty**

Thank you for your consultation on the above dated 25 June 2018 which was received by Natural England on the same date.

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.

Neighbourhood Planning Regulations

In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out.

Therefore, measures may need to be incorporated into the neighbourhood plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. This will be particularly important if a neighbourhood plan is to progress **before** a local plan has been adopted and/or the neighbourhood plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the local plan.

Sweetman II

A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment ('HRA') when deciding whether an appropriate assessment of a plan or project is required. The court concluded that measures intended to avoid or reduce the harmful effects of a plan or project on a European Site can only be considered as part of the appropriate assessment stage of HRA, and not at the preceding screening stage. This means that it is no longer appropriate to rely on these measures when deciding whether a plan or project is likely to have a significant effect on a European site(s).

Natural England is currently considering the particular implications of the judgment for its advice on neighbourhood planning and the basic condition that the making of the neighbourhood plan is not likely to have a significant effect on a European site (paragraph 1, Schedule 2 of the Neighbourhood Planning (General) Regulations 2012).

In the interim, we advise that local planning authorities, as competent authority for neighbourhood plans, should consider this judgment before relying on measures intended to avoid or reduce the

Should the proposal change, please consult us again.

Yours sincerely

Victoria Wight
Natural England

Corpusty & Saxthorpe Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Corpusty & Saxthorpe Parish Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed.

Please fill in your contact details below:

Personal Details			
Title: Mr	Name: Iain Withington – Team leader Planning Policy		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input checked="" type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	
Organisation Name (if responding on behalf of your organisation)			
North Norfolk District Council – Planning Policy Team Leader			
Address: Council Offices, Holt Rd, Cromer, Norfolk			
Postcode: NR27 9EN			
Telephone: 01263 516034		Email: iain.withington@north-norfolk.gov.uk	

Please note: all responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available. Any other personal information provided will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 and will not be made available on our website. For more information on how we process your data please see our [Data Protection](#) and [Privacy](#).

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation would be necessary.

In order to represent the Local Planning Authority
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Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted. If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, Norfolk, NR27 9EN. **Representations must be received no later than 5pm Monday 6 August 2018. Late representations may not be accepted.**

Signature:

Print Name: Iain Withington

Date: 06.07.18

For official use only	
Date received:	Ref No:

Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so you may wish to address whether or not the draft neighbourhood plan meets the basic conditions and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

In the table below please complete each column to show:

- which part of the Neighbourhood Plan your representation (comments) relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- any changes you think necessary. If seeking textual amendments please include your proposed revised wording for or supporting text, including the justification for it along with any supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **Further submissions will only be at the request of the Inspector, based on the matters he or she identifies for examination.**

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Whole Plan	S	<p>The Council has worked with Corpusty & Saxthorp Neighbourhood Plan Group, providing advice on Neighbourhood Plan formation, structuring, and appropriate evidence along with examples of best practice plans, guidance and policy. The overall submission is broadly welcomed as a whole. However it is considered that its overall structure remains rather confusing and somewhat difficult to follow & some areas of general conformity / duplication and repetition remain.</p> <p>The plan seeks to provide a framework covering a number of key objectives and as advised with such an approach runs the risk of general conformity & duplication issues with the adopted Development Plan, the emerging Local Plan and in some cases national policy. The plan overall seeks to be a positive document, however it remains important for North Norfolk District Council to provide comments at this stage in order to establish the extent that the</p>	Consider conformity, duplication, repetition issues throughout the document.

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		<p>previous extensive comments have been taken account and to establish any new issues arising. It is important to state these at this stage as this is the final opportunity for the Council to raise these matters for the consideration by an independent Inspector. The Council has made considerable efforts through ongoing dialogue to explain its previous pre submission comments with the aim of reducing the risk of further amendments being required by the appointed independent examiner. However it is recognised that it remains a choice (and risk) for the Neighbourhood Plan Group how best to take on board and reflect on this advice.</p> <p>This is the first opportunity that the Council has had to review the content of the submitted documents, having previously advised on their content & structure and provided up to date best practice examples for the group to review and it is perhaps disappointing that much of this has not been applied.</p> <p>Overall the Council is supportive of the plan however in reviewing the documents, whilst a number of our previous representations have been addressed, there are a number which have not and these are reiterated in this schedule below:</p> <p>Specifically there remains concern that there are areas that may not be sufficiently justified through supporting evidence and or the most appropriate and up to date evidence used. There appears instead to be a reliance on community views for justification on many of the approaches.</p> <p>Secondly that there remain a number of areas where there is concern around potential conflict with and or unnecessary duplication of national policy and the Core Strategy.</p> <p>To rectify this some of the detailed policy wording and supporting text require improvement and clarification. Such improvement could aid future implementation, remove ambiguity and improve clarity and repetition to enable interpretation and the plan to be effectively applied. In particular some policies seem to conflict with others in the neighbourhood plan itself and this will need to be rectified if the plan is to be effective.</p>	

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		Thirdly the structure of the document could be improved in order to reduce repetition / perceived conflict between and provide clarity to aid the implementation of the proposed policies.	
Whole plan	N	<p>Terminology – there remain an issue with regards wording and the referencing of evidence base documents and external links (some of which do not work) within the submitted documents.</p> <p>Previously advised that much of the evidence appendices and references to such should be separated out from the plan. Where an appendix is intended to act as a guide, text in the neighbourhood plan could be amended to refer to the guide by title</p>	Where relevant, references to appendices and external links could be removed from and correctly referred to in any supporting text.
Whole plan	N	<p>The additional detail and web links provided within are helpful, however there is concern that they could detract from the interpretation and implementation of the policies/plan.</p> <p>Some links are to superseded and outdated information and should be reviewed.</p>	It is suggested that footnotes appear outside of policy boxes and kept to minimum. Footnote 4 policy H2 states the Core Strategy in Full; this could just ref the policy number.

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Whole Plan	N	There remains blurring on some of the mapping used to illustrate the plan. appropriate keys should be large enough to read eg fig 1 , 3,4,6,7,8,9,15 ,16	The images should not be stretched and the key / copyright data clearly readable.
1.1	N	This section could be updated. Section detailing the process leading up to a referendum is not relevant once the plan is made	Remove said section and add text on how the neighbourhood plan once made will sit along side the Development Plan and be a material consideration in the determination of planning applications.
1.2 – 4 th para 6 th para	O	Incorrect title of Development Plan Document and footnote 4 link. Reference to https://www2.north-norfolk.gov.uk/planning/21416.asp is incorrect	Replace North Norfolk District Council's Priority Area Development Plan with Site Allocations Development Plan Document 2011. Update link to correct adopted document. https://www.north-norfolk.gov.uk/media/1274/site_allocations_plan_-web.pdf Replace with updated link to NNDC website planning policy page https://www.north-norfolk.gov.uk/section/planning/planning-policy/

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
3.1	N	Considered that this section may need updating or removing as it is part of the basic condition statement	Consider rephrasing or removal.
Fig 6,7,8	N	The Council's evidence base has been continuously updated to inform the Local Plan and emerging neighbourhood plans. No source or date is applied to the flood extent mapping. An updated SFRA taking into account climate changes and all sources of flooding has been published. The flood maps could be updated to reflect the most up to date information of all sources of flooding taking into account climate change as detailed in the published SFRA	Consider updating flood risk mapping to reflect the most up to date position.
Section 5.3.2, fig 10,11, table 1	N	This is new information inserted since the pre submission publication. It is questioned what value it brings and whether this detailed information on archaeological finds should be published within the body of the plan. It would make more sense to provide a link to the County Council's website for those interested – 6.8 (2 nd para) would seem the appropriate location for this. http://www.heritage.norfolk.gov.uk/	Review Norfolk County Council response in relation to Heritage and Archaeological matters. Consider removing the section to an evidence base supporting document. and or adding a link to County council's web site.

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Whole section - 5.3.3	N	<p>It is recognised that North Norfolk has one of the highest proportion of elderly in its population and that the over 65s represent the fastest growing age groups in the district. This is evidence in the 2017 SHMA at a district level and in census data. This section utilises census data as base data but seeks to create a forward extrapolation of population based on a set of assumptions contained in appendix 2. The general finding however accord with the district profile and aging population. Planning guidance states that projection should be based on the most up to date information currently the 2014 household projections.</p>	<p>Reference to the Strategic Housing Market Assessment, SHMA and official ONS publications would strengthen the evidence</p>
5.3.4 4 th para	N	<p>Reference to negotiations with landowners willing to sell their land for development including a clear expectation for improvements to footpaths and bridleways around the village could be seen as misleading.</p> <p>S106 contributions are a mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development. The tests are:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. <p>The agreements are a direct result of negotiations between the LPA and a proposal/ developer as part of the planning application process.</p>	<p>For reasons of clarity this section could be amended .</p> <p>It could be explained that in selling land for development there is an expectation that the policies contained in this neighbourhood plan in association with the wide development plan should be taken into account in setting the appropriate land value so as to enable capturing appropriate funding contributions for infrastructure.</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Section 6.2.1, page 39 & Section 6.3 overarching policy 1	O	<p>Pont ii- It is unclear how the requirement that “never less than 25% affordable housing as stated at (ii) will be achieved. A viability assessment will determine the viable amount of affordable housing and no more than this can be required.</p> <p>As previously advised the desire to provide a minimum of 25% affordable housing does not conform to the Core Strategy. Although we welcome the addition of a reference to suitable viability evidence, the proposed minimum has not been itself subject to scrutiny. Never the less 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. As previously advised as the NP continues to stipulate a minimum threshold for affordable housing the text (plus other policy references) should not seek to propose affordable housing levels for anything less than the strategic policy requirement. This requirement should be added to the policy</p>	<p>Remove wording “never less than 25”</p> <p>Amend the text and other policy references to accord with the Core Strategy and or emerging Local Plan so that these policy requirements for affordable housing are used in determining planning applications in order to ensure that Corpusty and Saxthorpe do not deliver a lower than viability amount of affordable housing.</p>
6.3 para 2 page 39	N	Typo - pPan	Amend to Plan

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Overarching policy 1	N	<p>As previously advised - 4th bullet –. There is no need to reference in the policy that the site has been previously allocated as this NP policy will become the most up to date policy for that site.</p> <p>See comments above re Section 6.2.1, page 39 & Section 6.3 overarching policy 1</p>	<p>Delete bullet 4</p> <p>As above - Amend the text and other policy references to accord with the Core Strategy and or emerging Local Plan so that these policy requirements for affordable housing are used in determining planning applications in order to ensure that Corpusty and Saxthorpe do not deliver a lower than viability amount of affordable housing</p>
Section 6.4 - Overarching policy 2	S	<p>These designations for green space are supported and appropriately evidenced. Reference to appendix 17 is incorrect it should be appendix 15. it is considered that the reference to the appendix should refer to the title of the supporting document .</p>	<p>Update ref appendix 17 and consider altering to state the title of the document - Appraisal for designation of green spaces supporting document.</p>
Section 6.5- Over arching policy 3 Residential density	O	<p>First para page 45 - As previously detailed - specific reference to the London Housing Design Guide and Parker Morris space standards do not accord with national policy, are not best practice , have been superseded with more recent guidance and as previously advised in any case are questioned as to how these relate to or are justified in the North Norfolk context . National policy is very clear in that the only local standards that can be adopted are the nationally prescribed technical and space standards. The PPG states that these should only be brought forward through the Local plan.</p> <p>Attention is drawn to the detailed comments previously made by NNDC at pre submission stage detailed in point 7 and 8 in the schedule of comments appended to the submitted consultation statement.</p>	<p>Reference to such standards should be removed.</p> <p>Web Links to Wikipedia should be removed Web Links to out of date standards removed. Conformity issues need to be resolved</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		<p>Footnote References to Wikipedia (Parker Morris) are not appropriate.</p> <p>Footnote ref to interim London housing standards -irrespective of other comments it remains that the link to outdated standards are not appropriate and are different to those referred to in the text. As Previously advised that this reference takes the reader to the 2010 interim standards. As detailed in the Council’s pre submission response and irrespective of the current national position on the setting of local standards. 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 bed spaces 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.</p> <p>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.</p>	

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Overarching policy 3	N	<p>As previously advised 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>Secondly - It remains that the wording here is at odds with other draft policies in the plan</p> <p>Thirdly - there is no mention of the density having to respond to the prevailing form and character of the area. Having a rigid net density figure is not without its risks. This set density requirement conflicts with bullet 3 and 4 in subsequent policy H1</p>	Amend text and bullet point 3 in the policy in light of potential conformity and clarity

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Overarching policy 3	N	Bullet point 5 and 6 are duplications of bullet points in overarching policy 1	For reasons of clarity and duplication they should feature in one policy only.
Planning policy H1 p 46	O- parts	<p>See previous comments re including links to appendices above and web links in policies.</p> <p>Irrespective of above the ref to appendix 9 is incorrect it should be appendix 14 or better still the Design Guide.</p> <p>As previously advised :</p> <p>The policy could also advise of NNDC design guide SPD;</p> <p>Bullet 2 references requirement for archaeological investigations. This is a similar requirement to the NNDC development plan contained in EN8;</p> <p>Bullet 4 –this bullet covers the importance of density being compatible with its surroundings. However, it doesn’t necessarily sit comfortably alongside Overarching Policy 3 density requirement for 25dph - is clarity required around the potential conflict with overarching policy 3 and density requirement of 25dphnet?</p> <p><u>Bullet 5 - London housing standards (interim) requirement – is not supported.</u></p> <p>Notwithstanding the comments above specifically on the inclusion of London Housing Standards (detailed in Section 6.5- Over arching policy 3 Residential Density) and the use of local standards in relation to national policy and guidelines 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</p>	<p>Amend as appropriate , for reasons of clarity and conformity with national policy and the adopted Development Plan</p> <p>Delete policy requirement for London (interim) standards and Parker Morris space standards.</p> <p>Delete bullet 7</p> <p>Delete bullet 10 and add appropriate text into the supporting text where it is more appropriate</p> <p>Clarify density approach and potential conflicts with overarching policy 3</p> <p>Clarification of when bullet 9 applies – only in relation to bullets 7 or 8 or if is an additional requirement need to expand on what is needed.</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		<p>assessment of viability.</p> <p>The Council consider that this view has not been adequately explained and the justification required for the departure of from the nationally prescribed standards contained in the Building Regulations and national planning policy /guidance is not established or warranted.</p> <p>Bullet 7 - Technically development outside the settlement boundary is limited to that which is required for a rural location in line with Core strategy SS2. 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. This section is not seen as necessary. <i>The bullet point does not add to the policy any local distinctive requirement in addition to SS2.</i></p> <p>Additionally it is not clear what is meant by "Rural green areas".</p> <p>Bullet 9 – ambiguity - it is not clear what this is requiring, is it allowing other forms of residential than those permitted by bullets 7 and 8 or clarifying other requirements which will relate to bullets 7 and 8?</p> <p>Bullet 10 – is a new addition since pre submission and is duplication of national policy.</p>	
Planning Policy H1	S	<p>Last section - mitigation - This requirement carries forward an existing development plan policy CR01 in the site specific allocation document , the allocation will not be replaced in the new emerging Local Plan partly due to the emergence of the Neighbourhood plan. Given this there is a requirement for conformity reasons with the Core strategy to include the required measure.</p>	

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Planning Policy H1		Foot note for bullet 7 - web link is not recognised	Delete footnote
Planning Policy H2 P47	O	<p>General – elements of the policy are ambiguous and it is not clear how it can be interpreted or applied.</p> <p>Bullet 1 – a policy should be a requirement stipulating that certain requirement should be met rather than “if”</p> <p>Bullet 1 b it is not clear if the statement “<i>this applies to all housing</i>” applies to affordable housing or all housing including market and affordable.</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 aim of updating this requirement in line with revised national approach on accessible and adaptable homes is generally supported, however there needs to be a reasoned justification in the text and the requirement and proportions evidenced. - There is also a conflict with bullet 4 below that needs resolving.</p> <p>Bullet 3 It is for the determining body i.e the planning authority to review viability evidence and not the Parish Council. The Parish Council remains a consultee on applications.</p> <p>Bullet 3 - The inclusion to the Core Strategy Reference of 50 % requirement is welcomed, never the less the council remain of the view that the percentage of affordable housing required is best evidenced through the Local Plan and emerging Local Plan where</p>	<p>Amend as appropriate for reasons of clarity and conformity</p> <p>Bullet 1 delete “if” the following conditions are met</p> <p>Bullet 1 b remove this applies to all housing - clarity</p> <p>Consider merging bullets 2 and 3</p> <p>Bullet 3 - Delete the requirement for the parish council to review any viability assessment.</p> <p>Bullet 3 – Reword as “For developments of 10 or more dwellings, at least 50% of all dwellings, subject to viability shall be affordable housing.” -conformity reasons</p> <p>Bullet 4 review for reasons of clarity Consider comments</p> <p>Bullet 4d delete</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		<p>additional viability evidence has been commissioned and is emerging. Never the less if the NP group seek to stipulate a minimum percentage off 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 Planning Authority.</p> <p>If a viability assessment which has been considered by the Council as Local Planning Authority showed that due to the specific issues of a site it was only viable to provide less than 25% affordable housing, this policy cannot require a minimum provision of 25% and so should be reworded. Instead in the pre-amble this aim could be stated as setting the communities expectation for minimum delivery of affordable housing, albeit where viable a higher amount than 25% will be sought in accordance with the Council’s policy.</p> <p>Bullet 4 - see comments above re bullet 1, however in addition there is a conflict that bullet one requires 20% and bullet 4 requires at least 30%. It is unclear how this policy would operate. Is it saying to not have to provide 30% of homes to M4 (2) of Building Regulations you can provide residential care or adapted living properties for the elderly? This is not clear and will make implementation of the policy difficult. It is not defined what “adapted living properties for the elderly” are – also these dwellings should be fully compliant with M4 (2) as a minimum</p> <p>Bullet 4d - It is not clear what is meant by bullet 4d - neighbourhood plans should be clear and unambiguous and drafted with sufficient clarity that the decision maker can apply it .</p> <p>Provision of 2 and 3 bedroom homes would not address a deficiency in accessible homes and so is not an appropriate replacement if accessible homes are required.</p>	

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Community aspiration CA1 p48	O	<p>The aspiration is noted. However, it is something which the Council could not support as affordable housing (other than that provided on rural exception sites) must be available to discharge the Council's statutory housing duties and so this requirement will take precedent over the aspiration. Including bullet 6 does not override the Council's objection to this community aspiration policy.</p> <p>It is not clear at bullet 4 or 5 what an "essential need" or "functional need" is therefore it is unclear who will and will not qualify as having a local connection as defined in this policy using these criteria. Additionally it is unclear what "proven age" means. In relation to a local connection at bullet 4 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 should be amended if the policy is retained.</p> <p>The Council recognises the aspiration of communities that affordable housing meets local housing need, and so its Housing Allocation Policy allows general needs affordable housing to be prioritised based on local connections as determined by the Local Allocations Agreement where there is no one on the Housing Register (with the most urgent housing needs for which the Council must give reasonable preference) suitable for a dwelling.</p>	Remove policy/ aspiration

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Policy H4	N	The policy numbering skips to H4 missing out H3	Amend policy numbering and any relevant references accordingly
Policy H4	N	<p>This policy is considered 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.</p> <p>Repetition with other polices 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>Rename H3</p>	<p>For clarity elements of this policy could be combined with policy H1 to improve implementation and remove duplication</p> <p>Rename H3</p>
Policy E1 p 50	N	<p>Note Policy numbering has changed from E2 in pre submission version</p> <p>First bullet should reference species as well as habitat</p> <p>Second bullet should ref adverse impact not loss</p>	<p>Add species first bullet</p> <p>2nd bullet — amend to loss to adverse impact not loss</p> <p>Review whole policy against Core Strategy poly EN9</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Policy E1/2/3	N	Whilst we welcome the Corpustry & Saxthorp NP recognising the importance of Agricultural land and the protection and enhancement of local biodiversity as previously advised there is concern that parts of each policy are duplications of national policy and parts of the adopted Core Strategy	Review whole policy against Core Strategy and in particular policy EN9
Policy E4	N	Should be clear and unambiguous – what is meant by “where relevant”?	Policy should be amended to provide clarity as to whether proposals should be accompanied by the listed supporting documentation or only when relevant – which is it?
Policy E5	N	As previously advised Reference to Design in Appendix 14 – clarity is sought previous references have been to design guidance. Are not the contained in the plan? The clarity that good modern design will be supported is welcomed	Amend references to design polices and appendix 14

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Policy HE1 figs 9 and 10 /table 1	N	<p>It remains unclear if Norfolk Historic Environment Services as part of Norfolk County Council would be in agreement with this potential onerous requirement for all applicants to formally consult with Norfolk Historic Environment prior to submitting an application. This is normally reserved for consultation at the time of application by the LPA. That said it if it is acceptable to NCC then the provision of such a response should become a validation matter on submission of any application to NNDC.</p> <p>The inclusion of this policy requirement and the figures 9/10 / table 1 which demonstrate locations of spot finds in the parish is questioned as relevant to the plan.</p>	Review feasibility with Norfolk County Council
Policy HE2	N	The inclusion of the “setting “of the church into the policy is welcomed.	
Design Guidance / Fig 19	N	<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>Fig 19 is repeated page 56 and 63</p> <p>As advised 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</p>	Further consider the appropriate location for the guidance. Figure 19 appears twice on page 56 and 63 . Remove duplication. Remove ref to council housing in the examples of best practice.

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
		<p>and in order to avoid confusion and duplication the NP could choose one place for this guidance to sit.</p> <p>The examples of characteristics village buildings that development should follow as detailed in section 6.9 and policy DC1 include images of the Council housing on Heydon Road. It is questioned whether this is an example of architectural “best practice “ to be followed by future development?</p>	
Policy D1	O- parts	<p>As advised previously the web link is incorrect please use https://www.north-norfolk.gov.uk/section/planning/planning-policy/</p> <p>1st para – the requirement to reflect examples of existing building types should not include Council housing as detailed in Fig 19. See above comment ref fig 19</p> <p>Reference to low density up to 25 remains a conflict with overarching policy 3 which requires a net density of 25dph. The last sentence of para 3 which stipulates <i>higher densities will be only accepted.....has the potential for confusion in interpretation when combined with policy H3.</i></p> <p>This also conflicts with density ref in policy Hi bullet 4 where density should respect existing form.</p> <p>The use of the word “<i>mood</i>” is considered subjective <i>and ambiguous</i></p>	<p>Update web link Amend policy removing ambiguity and to provide clarity on approach to densities</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Policy DC2	N	<p>As previously advised the policy does not add any local distinctiveness or further requirements over and above existing Development plan policy position.</p> <p>The policy requires <i>“any proposal”</i> to contribute to the provision of open space – is this the intention – this would include a residential development of 1 unit as well as employment uses etc</p>	Consider local distinction and if the policy should refer to residential development rather than all types of development.
Policy D3	O	<p>This new policy fails to identify the type of development which the guidance refers as it seeks to require the use of sprinklers in <i>“all new developments”</i> this could apply to such development as single dwellings , extensions, outbuildings, agricultural buildings etc</p> <p>It is considered to be disproportionate and to go beyond current building regulations.</p> <p>What is the evidence and justification for such a policy</p>	Delete policy and seek evidence / clarification from Norfolk Fire and rescue service.
Policy B1	N	<p>Should ref be to Figure 18?</p> <p>The word <i>preference for</i> could be written as will be supported.</p> <p>Does the second para, <i>new buildings for light industrial or other business uses will be supported</i> contradict earlier preferences in the first para?</p> <p>Bullet 1 contradicts bullet 7 and first para</p>	<p>Amend reference to fig 18</p> <p>Consider amending wording for clarity.</p> <p>The policy title could be amended to detail development on the identified priority Area 3 only with e removal of other conflicting bullet points</p>

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Policy B2	S	<p>The reference to setting a local requirement is welcomed to this otherwise national policy requirement but perhaps it could be phrased better eg</p> <p>Any transport assessment should set out how the proposal will seek to minimise conflict with other road users and maximise safety.</p>	Consider rephrasing for clarity
Policy ED2	S	<p>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 the policy could be praised to clarify that it is proposals which support the mobile library will be supported rather than encouraged.</p> <p>Clarity is required around “ and other forms of information “</p> <p>Library contributions from small scale developments are unlikely to comply with the CIL regulation in terms of being necessary to render such proposals acceptable in planning terms.</p>	<p>The policy could be praised to clarify that it is proposals which support the mobile library will be supported rather than encouraged.</p> <p>Clarity is required around “ and other forms of information “</p>
Policy T1	S	<p>As previously advised 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.</p> <p>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</p> <p>The addition of clarity around what local schemes are envisaged is welcomed.</p>	Contributions as deemed by the parish council should be seen as an aspiration and the policy requirement amended.

Please use additional rows / additional sheets of paper to add further comments.

Corpusty & Saxthorpe Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Corpusty & Saxthorpe Parish Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed.

Please fill in your contact details below:

Personal Details			
Title: Miss	Name: Naomi Chamberlain		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input checked="" type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	
Organisation Name (if responding on behalf of your organisation) Norfolk County Council			
Address: Norfolk County Council, County Hall, Martineau Lane, Norwich, Norfolk			
Postcode: NR1 2DH			
Telephone: 01603 638422		Email: naomi.chamberlain@norfolk.gov.uk	

Please note: all responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available. Any other personal information provided will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 and will not be made available on our website. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#).

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation would be necessary.

Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted. If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planninpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, Norfolk, NR27 9EN. **Representations must be received no later than 5pm Monday 6 August 2018. Late representations may not be accepted.**

Signature: Naomi
Chamberlain

Print Name: Naomi
Chamberlain

Date: 3rd August 2018

For official use only

Date received:

Ref No:

Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so you may wish to address whether or not the draft neighbourhood plan meets the basic conditions and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

In the table below please complete each column to show:

- which part of the Neighbourhood Plan your representation (comments) relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **Further submissions will only be at the request of the Inspector, based on the matters he or she identifies for examination.**

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Page 65, Planning Policy T1. Traffic Calming	Object	The County Council raised a concern about the wording of in response to the Reg 14 consultation. The final sentence of paragraph 1 suggests that the Parish Council can dictate the traffic calming measures in the village. However, this responsibility is that of the County Council.	New development promoting and protecting highway safety will be encouraged. It is expected that traffic from new commercial/ industrial developments and new residential developments comprising five or more dwellings, will generally contribute to traffic calming measures within the settlement boundary. where the Parish Council deems it necessary.

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Page 65, Planning Policy T1. Traffic Calming	Neutral	<p>The addition of Planning Policy T2. Public Transport (page 65) seeks to improve bus stop facilities through development. The requirement for new facilities will be determined through individual applications.</p> <p>Where shelters are sought the Parish Council will need to ensure that funding is secured for long term maintenance.</p>	
Appendix 9 Water, Sewage and Drainage Issues	Neutral	<p>It is noted that the Neighbourhood Plan indicates there is some consideration for flooding by the inclusion of figures but has not included a specific policy regarding flooding. Hence the LLFA assumes that the overarching policies on the risks of flooding and sustainable drainage systems (SuDS) provision of the Local Development Plan will apply. Whilst the site has indicated areas it suggests are priority areas for development there is no detailed supporting evidence to suggest that the risks of flooding from all sources has been considered. It is noted that Appendix 9 – Water, Sewage and Drainage Issues does indicate some consideration that the sites are located in areas of low risk of flooding from the Fluvial and Coastal flooding. The LLFA has reviewed our information and also note there are some small areas of ponding from the Environment Agency Risk of Surface Water Flood Maps which can be considered during planning applications. It is noted that there is no information on how the site will drain but welcome that the document, Appendix 9 – Water, Sewerage and Drainage, indicates that all the site will have to comply with National SuDS standards and consult with Norfolk County Council as LLFA.</p>	

Page Number + Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Suggested Change
Page 53, Policy HE1: Archaeology		It is noted that Planning Policy HE1: Archaeology (page 53) states that “all applications within 250 metres of an existing Historic Environment Record should consult with the Norfolk Historic Environment Service as to whether a more detailed archaeological survey is needed prior to determination of a proposal”. It is also noted that in the Consultation Statement document the consolidated officers have raised a concern about the scope of this policy (page 53-54). NCCHEs supports the officers’ comments and would be happy to discuss the proposed policy approach further.	

Please use additional rows / additional sheets of paper to add further comments.

Chris Brown

From: Planning Central <Planning.Central@sportengland.org>
Sent: 25 June 2018 09:48
To: Planning Policy
Subject: Corpusty & Saxthorpe 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 Playing Fields Policy and Guidance document.

<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,

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Join the conversation #thisgirlcan



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