

Rackheath Neighbourhood Plan Review (Submission Plan) (including response of the QB)

As you are aware I have been appointed to conduct the Examination of the Rackheath Neighbourhood Plan Review. In order that I may progress the Examination I would be grateful for the Qualifying Body's response to the initial enquiries below; the local authority may also have comments (in one instance I make a specific request).

My purpose here is to better understand the intention behind the policy content from the authors and it is not to invite new content or policies that will not have been subjected to the public consultation process. In particular I need to be sure that the Plan meets the obligation to “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” (NPPF para 16). It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy.

Where the Qualifying Body has accepted a point made in representations and I have no further query I have not included a reference below but will carry those agreements forward into my Report.

Contents

The Contents page includes “4. The Vision: 2037” but I presume that should now read ‘2045’?

QB Response: Agree

6.1 Policies: Housing and the built environment

Policy HOU1

As the local authority has noted, “It is impractical to ensure complete privacy with development at density”. Particularly with terraced and semi-detached properties the overlooking of neighbouring gardens is inevitable. Developers generally seem adept at locating open spaces and drainage swales etc to ‘reassure’ the host community, but that can be evidence of the tension between ‘integration’ and ‘distancing’. It is perhaps unfortunate that the new Design document doesn’t illustrate local good examples on privacy. Is the reality that development proposals should evidence their measures to address overshadowing and privacy between dwellings and their private open spaces; these can then be seen in context rather than in the abstract?

QB Response: Agree that this is a difficult issue with high density development where space is at a premium. The intention behind the policy was to encourage new development to be respectful of the rural location and to create developments in which residents feel safe and able to enjoy the amenity of their home and garden in relative privacy. We had seen developments by the same developers elsewhere in Norfolk where it was possible to see into neighbouring dwellings. We felt that some thoughtful orientation and use of back gardens could usefully help to mitigate such instances. An example of an existing development in the parish of which does not have this issue is Wilkinson Road, off Green Lane West , opposite the developments at Princes Park and The Landings. (See Map extract below) . However, if development proposals can be required to evidence how their layouts will address overlooking, overshadowing and privacy this would move towards mitigating the issue.



Wilkinson Road, off Green Lane West ,
Rackheath.

In element 4 of the Policy it is perhaps unfortunate that the words “centrally locating” have been used when an earlier paragraph explained that the phrase was now less relevant; perhaps it’s sufficient to say “away from settlement edges and visually sensitive locations”?

QB Response: Agree with suggested rewording

Policy HOU2

No comment.

Policy HOU3

I note that the Policy says: “The mix of housing will be informed by the Rackheath Housing Needs Assessment”. However, that document says: “We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with BDC, with a view to agreeing and formulating draft housing policies”. Further, the Policy then says: “To meet housing need and enable social diversity, the mix of the housing across the parish should include the following:”. It would seem that developers are faced with more confusion than guidance on housing mix?

QB Response: This policy has been developed taking into account previous comments from BDC and other consultees. Similar wording and process have been used in other recently examined plans in the Broadland/South Norfolk area e.g. Hingham, Newton Flotman, and also further afield – Ufford in East Suffolk where the examiner recommended such a reference to the Housing Needs Assessment be added to the policy.

6.2 Policies: Environment and Landscape

Figures 13, 14, 15 & 16

Whilst the map copyright holder is declared, the data sources here are not and therefore the reader cannot check such matters as how the data was collected, the specific definitions for the key and whether there are updates; ideally a hyperlink will be provided.

QB Response: This can be amended for the next version of the Neighbourhood Plan as follows:

- **Figure 13: Ancient woodland – Natural England (can put in the key)**
- **Figure 14: Woodland – Friends of the Earth (can put in the key)**
- **Figure 15: Green infrastructure – key already states Natural England**
- **Figure 16: Flood map – key already states Environment Agency**

All maps are taken from Parish Online, February 2024. It is a subscription website and therefore hyperlinks cannot be provided.

Para 6.2.13

“With regard to water supply, the Rackheath area was already over abstracted at the time of the development of the 2017 Neighbourhood Plan”; statements such as this are worthless unless the evidence source is declared.

QB Response: Noted.

Policy ENV1

I note the local authority's general support for the content here. However, I have the following comments:

- I do not agree that it is “entirely appropriate for the NP to contain policy and guidance to ensure that any WWTW is designed, located and built in such a way to ensure that it does not adversely impact on the amenity of adjoining occupiers or residents.” Parliament has decided on other means to achieve this public good.

QB Response: The reason for the NP attempting to address this issue lies in local experience. The existing WWTW in Whitingham (south of Norwich) has consistently been a source of odour for the adjoining communities of Trowse and Thorpe St Andrew yet after 10 years the problem persists as the specific source is yet to be identified. Independent consultants commissioned by the Community Council have recommended in their report that any WWTW must be fully enclosed – particularly where such a WWTW is to be located in close proximity to new dwellings as its potentially the case here for GT16

- “Any fresh water supply or wastewater treatment plant must be completed and connected prior to first occupancy” – apart from the issue of ‘excluded development’, does this not go without saying as these are basic necessities?

QB response: Local experience has suggested that this is not the case in practice and it is not just an isolated occurrence when it does happen.. The residents of Wherry Gardens in nearby Wroxham were not connected to the mains drainage and had to endure years of temporary septic tanks which were then emptied and tankered away at regular intervals resulting in a lingering odour for the development together with HGV movements.

<https://www.edp24.co.uk/lifestyle/20853051.its-shameful-unacceptable-allowed-go-on---villagers-wroxham-kick-stink-smell-unconnected-sewers/>

Nearby Spixworth has such a policy in its ‘made’ Neighbourhood Plan- Policy 3 – which requires connections by first occupation. This is because of experience of development in Spixworth. <https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/snp-adopted-version-wcag.pdf>

Furthermore the recent planning application for the WWTW at neighbouring Sprowston/Beeston Park , in the supporting Planning Statement, the applicant explained that a number of dwellings would occupied before mains connections would be available and that tankering of waste would need to take place . Initially this was to be 150 dwellings completed and occupied before connections would be made. (See appendix to this document for extract from the planning statement).

- “* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” – the Revised Plan will be a replacement for the earlier Plan; references therefore need to go to the source material not via an old document.

QB Response: Noted. This can be updated as appropriate for the next version of the NDP.

- “The Community Council will not adopt any SuDs, swales or drainage operations”; this is not a land use planning policy but might be included in the pre-amble to the Policy, for information. I wonder whether some confusion has arisen because of the use of the specific term “adopt” – would this actually be open to the Community Council to do?

QB Response: The reason for this wording is to make it clear to developers that the Community Council will not adopt any SuDS (approaches have been made in the past) . No objection to this being relocated to the supporting text.

Policy ENV 2

No comment (other than a repeat of the comments above about swales etc).

Policy ENV 3

I note the proposal to include wording suggested by the Norfolk Wildlife Trust.

The a), b) subdivision of paragraph 2 doesn't work since the content is all relating to the same point. I suggest the text just runs through as three sentences with an additional full stop immediately before "Optimally".

QB Response: Agree

Policy ENV4

In the first paragraph, the examples of actions do not all amount to "screening", therefore the word "screening" might better be replaced with 'buffer'.

QB Response: No objection

After the heading "Green Infrastructure buffers" there is duplication of "identified" as in "The identified Landscape buffers identified".

QB Response: Noted

Policy ENV5

As noted early in the Policy, non-designated heritage assets are not completely "protected from loss or significant harm" and therefore those words, within the sentence immediately prior to the list, ought to be replaced along the following lines: 'The following locally important non-designated Heritage Assets (figure 25) have been identified:'.

QB Response: No objection

I note the additional heritage assets have been helpfully detailed in Appendix 3. However there seems to be very limited value in illustrating buildings with an aerial view since the extent of the site is not marked and the character of the building(s) is not evident. Is it possible to use frontage illustrations as used elsewhere? I will look at each of the new assets now identified when I visit the area. May I presume that each of the property owners has been approached about the identification of their property in the Neighbourhood Plan?

QB Response: All property owners were provided with a letter in November 2024, explaining that their property had been provisionally identified, what this meant and how to make their views known. Some owners did formally respond and these are shown in the Regulation 14 response table in the Consultation Statement . Photographs of Mousehold Farm and The Old Rectory to be provided after 26/8/25.

Although it has been helpful for my purposes to know which properties were identified in the 2017 Plan, this notation will have no value to the reader of the new Plan and should therefore now be removed – do you agree?

QB Response: Agree. The notation has been used to date to aid with the consultation process.

13/08/25

I'm comfortable with all but one of the non-designated heritage assets - the problem one is 12 where there is no intrinsic heritage significance for all of this large space; the claimed significance is the fact that more than one listed building sits within it, but the setting of listed buildings is part of their listing, the extent of that 'setting' being determined on a case by case basis.

QB Response: The BDC Senior Heritage Officer has referred to proposed NDHA 12, as an NDHA in response to applications within the park (Extract from his comments on App Ref No: 20210036 – for 43 new dwellings in the Park – QB emphasis)

https://info.southnorfolkandbroadland.gov.uk/online-applications/files/AE85651DC690939E89870CBAE31BCA74/pdf/20210036-2021_03_30_Consutee_Comments_Senior_Heritage_and_Design_Officer_1333482-7521725.pdf

Heritage

With regard to the impact on the setting of heritage assets, the development can be considered to be within the wider setting of Rackheath Hall and the estate structures including the listed entrance gates off Wroxham Road, and the two lodges which can be considered non-designated heritage assets. There is also a listed bridge, although less affected as its setting is fairly immediate, and various WWI structures relating to war time airfield accommodation, but none in the immediate area. From map evidence the Wroxham Road entrance was created sometime between 1801 and 1834 prior to the house which was rebuilt in its current form and location in the early to mid C19. The parkland itself can be considered to be sufficiently intact with regard to the tree belt plantations and history of the site to also be considered a non designated heritage asset.

The relationship between this group of assets, although altered to some extent with the agricultural use and the loss of parkland trees to the north, can all be considered to be of some significance. With the planning of country house estates a significant element in terms of the design of the landscape of the house was the progression of views in the approach to the hall i.e. the contributions these various elements to the experience of arriving at the hall. This makes a contribution to the significance of the hall and its setting, as well as the other heritage assets viewed as an interrelated group. The main entrance gates off Wroxham Road was the main entrance to the estate and the entrance gates were sufficiently grand to mark that entrance, being exhibited at the Great Exhibition in 1851. The hall is partially visible from the gates – although more recent screen planting to the north side of the hall does now screen it to some extent in views. The picture given for Figure 2 in the Heritage Impact Statement, although this may have a degree of artistic licence rather than being truly accurate, does shows relatively little planting to the north side of the hall and that this elevation was historically and in design intention ‘open’ to views from the north. The lake is also on the north side. These visual connections between heritage assets are therefore important and contribute towards significance. The setting of the listed buildings are how they are experienced and the development of the area proposed where there was former parkland and still very open in terms of landscaping would draw the eye and detract. This can be considered to be harmful, and needs to be taken into account in the planning balance.

There is some evidence from the tithe map of former dwellings in this area, possibly cottages belong to the estate, although these have long since been removed, and the area is now very much characterised by the remnants of historic estate plantation planting with open areas converted to arable. Paragraph 3.2 does state that “At the northern end around the proposed site, the rolling landscape is still largely unspoiled and attractive, although the parkland has been ploughed out. “ The heritage statement also states that “It appears, however, that historically the view south from the gate lodges allowed and focussed on the view of the north elevation of the hall (see figure 9).

I appreciate that some screen planting has been proposed to the west, as well some areas left undeveloped as open space. However the proposal will fundamentally change what is currently a very rural area in terms of character. I disagree with paragraph 4.4 that the general rural character of the area will be retained. The sense of ‘openness’ with the rolling hills will be detrimentally affected by the development proposals resulting in less than substantial harm to the setting of the

heritage assets. In terms of mitigation screening this “can only mitigate negative impacts, rather than removing impacts or providing enhancement” (paragraph 40 of HE Setting Guidance.) Consequently the mitigation is not removing harm, more a matter of mitigating against it.

Regards Chris
Chris Bennett
Senior Heritage & Design Officer

Appendix 4

As noted earlier, the tabulation is deficient is not presenting evidence against the full set of NPPF criteria for designation. This needs to be corrected before I visit. As noted by the County Council, for the purposes of absolute clarity, a map illustrating the boundary of each area should be added.

Policy ENV6

I note that two additional vistas have been identified and illustrated. I will view these when I make my visit to the Area. As with the previous Policy, although it has been helpful for my purposes to know which views were identified in the 2017 Plan, this notation will have no value to the reader of the new Plan and should therefore now be removed.

QB Response: Agree . See response to ENV5 above.

13/05/25:

I’m comfortable that the view vectors identified relate to attractive areas of the Neighbourhood Area, but because they are broad vectors it is difficult to identify features that are critical to their natural attractiveness. This will make the application of the Policy open to wide interpretation.

QB Response: in the 2017 Neighbourhood Plan the view was shown using an arrow. In the pre-submission version the views were shown as viewpoint icons as used by the Ordnance Survey. BDC requested these be changed to cones in their response to the Pre-Submission Version (See Consultation Statement Page 116, representation 105). The cone icons could be amended to aid interpretation if required).

Policy ENV7

I note that the local authority comments on the first paragraph have been accepted.

The NPPF only provides for green spaces to be named or designated as Local Green Space if specific criteria are met. Therefore, it’s not possible to protect any space, current or future, “as if they are Local Green Space”. As the local authority has indicated, designation at a later date might be sought. I note that Appendix 4 helpfully tabulates how each space (except that listed as (h)) has been assessed against the NPPF criteria, except that those criteria have been misleadingly truncated. The NPPF says (para 107) that to be designated a local green space must be (inter alia): “demonstrably special to a local community *and* holds a *particular local significance*” (*my emphases added*) but the Appendix 4 table fails to mention this significant part of the overall criterion and fails to identify “particular” – as distinct from general – significance for the spaces listed. Before I visit I would like to receive an explanation of the “particular” significance of each space and, for the new spaces, I will need a larger scale map of each from which it is possible easily to identify their boundary. A yet to exist space cannot be assessed.

QB Response: Updated assessment tables have been provided . See separate LGS document

I note the several objections of the County Council because “these LGS designations are on highway land and the LGS designations could impede the Highway Authority’s ability to fulfil its statutory duties with regard to highway improvements, management and maintenance”. It seems improbable

that the whole of the green spaces identified are highway land but can the QB or the local authority confirm that is so? It may be that the Highway Authority is offering to map its operational areas onto base maps for possible exclusion from the LGS? Please could the local authority comment whether this is a 'standing' objection from the County Council since, on the face of it, there is nothing in an LGS (or Green Belt) designation that would "impede" statutory duties.

QB Response: Similar comments were made by the Highway Authority in respect of the Hingham and Newton Flotman Neighbourhood Plans where the Examiner's in both cases concluded the LGS designation would not impede the statutory functions of the Highway Authority.

13/08/25:

Whilst I'm comfortable that areas e & h meet the Local Green Space criteria, I'm doubtful about g because, at this time of year, I can't tell whether the area is poorly maintained or a wild flower meadow past its peak; a fenced off section is also something of a puzzle.

QB Response: The area is in the process of being transferred from the developer to the resident owned management company who will be responsible for its future maintenance and upkeep.

I assess areas d & f as no more than incidental amenity space, of which there are many other examples not selected; it might be possible to cover these with an 'amenity space' policy if it's possible to explain what has distinguished those selected from those not.

QB Response: Given the Examiner's comments on d and f above, it may be appropriate to cover these with an amenity space policy as suggested.

Policy ENV8

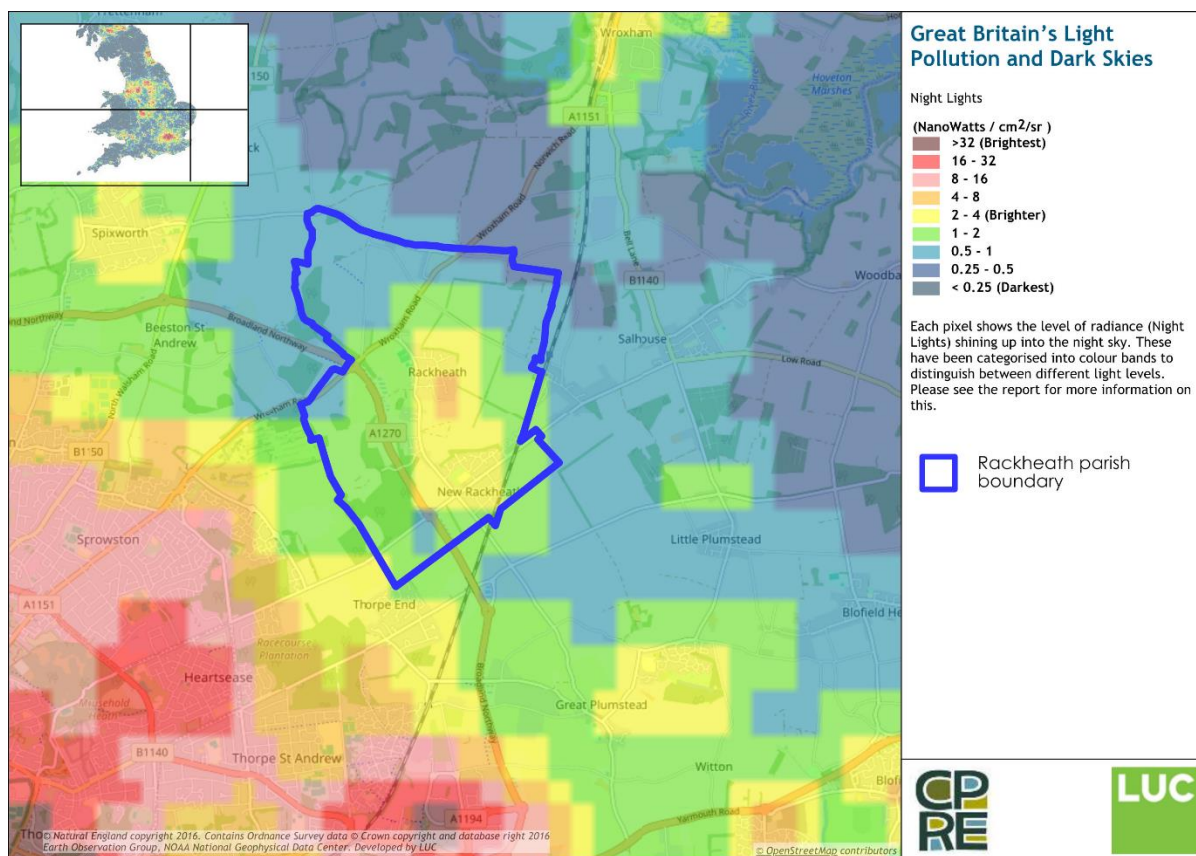
No comments.

Policy ENV9

I note this is a new Policy. Figure 28 is very difficult to use because the Parish boundary is not shown and the base settlement names are impossible to read.

QB Response: The maps is from another source which the QB does not have access to the original basemap, although it is possible to superimpose the Parish Boundary to aid some clarity.

New CPRE map with parish boundary added below:



The mention of “Norfolk’s Rural Dark Landscapes” has an obscure source referenced to a CPRE website, making a link to the map illustration perhaps? It is most unclear what prospective developers are expected to “take account of” and whether they would be following authoritative guidance?

QB: Response: The CPRE guidance in turn relies on the Norfolk County Council Environmental Lighting Zones which was Adopted in 2003. [Norfolk County Council's Environmental Lighting Zones Policy - Report - CPRE Norfolk](#)

In the second paragraph it is said that “Development proposals should demonstrate compliance with best practice guidance”; but “guidance” is, by its nature, not something that requires “compliance”. A more appropriate word would probably be ‘application of’?

QB Response: Alternative wording could be “Development proposals should demonstrate how they have taken account of best practice guidance”

It would seem that the third paragraph lacks the clarity required for confident application – when does lighting become “prominent lighting”?

QB Response: This could be clarified by the removal of the word ‘prominent’ from the sentence.

6.3 Policies: Community

Policy COM1

No comment.

Policy COM2

Since in the response to the local authority comments it is acknowledged that the Policy wording could be clearer and better related to actual neighbourhood spaces, could the wording better limit, with examples, the scale of spaces where parking provision should be expected?

QB Response: The parking provision aspect of the policy is aimed at those green spaces which are located with a cluster of other uses such as leisure, centre, community hub etc where parking may be required to cater for those uses or where the space is a sports provision that will be used by visiting teams who will be travelling from outside of the parish.

In relation to paragraph 3, since it has been acknowledged that “Provision [should/] would be in accordance with the Local Plan standards”, and the Design Guidance now exists and is referenced, is the paragraph needed at all?

QB Response: No objection to removal of reference to Local Plan and to rely on Design Code.

In the fourth paragraph might it be more appropriate to refer to ‘recreation options’ rather than “play options”?

QB Response : No objection

Policy COM3

No comment.

Policy COM4

In the second paragraph the phrase “and should be protected from changes which dilute its size or change its function as a community asset” would appear to amount to the local planning authority telling itself to protect a building of as-yet undefined size or function. This is not a policy. In the supporting text the Community Council may wish to commit, say, to seeking designation for the hub as an Asset of Community Value (I note such a project is already in hand), but that again would not be a planning policy matter at this juncture. Your comments are invited.

QB Response: The intention of this part of the policy is to safeguard the community hub building for use by the community by resisting changes of use to non-community use or from developments or alterations that might compromise its use and value to the community. This is a planning matter. This is the same approach to that outlined later in the policy below in reference to existing community assets. It is not the intention to use the NP policy to identify the building/site as an Asset of Community value (in which a moratorium period would exist in the event of sale) which is a separate process.

In the third paragraph, “The uses and management of such a building should be determined in consultation with the Community Council” is not a land-use planning matter. In the supporting text the Community Council may wish to note that it is/will be seeking participation in the designing and management of the hub (another Community Project?), but that could not be binding on the local planning authority. Your comments are invited.

QB Response: No objection to this issue being covered in the supporting text

Policy COM5

The first paragraph of this Policy includes the phrase “genuinely equally accessible to all groups within the community”; it is unclear what this may imply for the prospective developer (as distinct from the ultimate manager)? The second sentence promotes the particular interests of “young people and older people” but it is unclear (including from the supporting text) whether that is because ‘middle aged’ people are already well catered for? Again, it is unclear what message is intended for the prospective developer.

QB Response: The original wording of the policy talked about financial accesibility to sports facilities but was amended after comments from the LPA at Pre-submission Consultation. The intention of the policy is to ensure that where sports facilities are provided in new developments (for public good) that they can be accessed by those communities without financial disadvantage. For example if space were made available for gym or tennis which was then provided by a national

operator who charge a membership fee which may not be a realistic financial proposition those new residents when balanced against a community run or local authority operated facility which would be less expensive and then more accessible.

POLICY COM6

It is not possible to bind future planning decisions on eligibility for Local Green Space designation; if the allotments don't prove popular then it certainly wouldn't be possible to meet the 'demonstrably special' criterion. Your comments are invited.

QB Response: Noted. The intention was to, in the first instance, prevent the loss of the site to housing (even before the allotment had been established). It is acknowledged that protection as LGS in advance of their delivery would not be appropriate. It may be appropriate for future review of the NP if such allotments have been delivered and are popular.

6.4 Policies: Business and Employment

Paragraph 6.4.5

Whilst I agree with the Qualifying Body that the comments here derive from a factual record of consultation, I agree with the County Council that the inclusion of some examples will mislead as to the scope of a Neighbourhood Plan and I believe that the wording can be amended without detriment to the Plan content.

SG views: No objection to suitable amended wording

POLICY BUS1

The combining of business and retail policies into a single new policy appears to not have been completely thought through. The first paragraph refers to "light industry" and "offices" and "retail units"; the second paragraph suggests that a collective term for these is "businesses"; the last paragraph changes tack and refers to "commercial premises"; is the apparent distinction being made here of significance?

QB Response: The distinction is not significant and is likely to be as a result of merged policy wording. Business uses is the preferred term.

The third paragraph deals with design matters but no reference is made here to the new Design Guide which is where design issues are considered more comprehensively; whether the design guidance singled out in the Policy is readily applicable to the small retail units being sought might be questionable? In the fourth paragraph it surely can't be appropriate for all retail premises to avoid residential areas and "have convenient access onto the Broadland Northway"? It is unclear how the expectation of a maximum height of 14m for all premises has been devised and justified? The final paragraph details with the retention of premises but the title for the Policy remains "New and expanding businesses"?

Your comments are invited.

QB Response: It is acknowledged that the design guidance may not be suitable for the small retail units and should be applied proportionately. It is also acknowledged that direct access and convenient access are different. The policy could be retitled "New and Existing Businesses". The 14m height is an attempt to reflect the rural context and try to ensure that new buildings are not visibly dominant in the landscape and make them less imposing.

Policy BUS2

This Policy seems to assume the prospect of industrial developments of the type not apparently supported at BUS1. The first sentence mentions landscape and [unspecified] acoustic buffers but in the last sentence these have expanded to "screening to protect the visual, olfactory, and auditory

amenity of residents”. It is unclear what distinction is being made between “buffers” and “screening”; a bund can be an effective acoustic buffer?

QB Response: *The reference to screening is probably superfluous here and could be removed as the intention of the policy is covered by the term ‘buffer’*

Footnote 17 suggests that Class E uses are distinguished as “non-polluting industrial processes” but that is not a fair characterisation – the actual wording relates to industrial processes which “can be carried out in a residential area without detriment to its amenity”.

QB Response: *Noted no objection to proposed wording*

Paragraph 6.4.11

It is unclear how this sentence is related to the other content in this paragraph which appears to be about ensuring appropriate retail provision: “The ‘agent of change’ principle set out in the NPPF (paragraph 200, December 2024) will be applied to all such development [without retail provision?] to ensure that existing businesses do not have in reasonable [*sic*] restrictions placed on them as a result of development permitted after they were established.”

QB Response: *This paragraph was amended following representations made by Norfolk County Council at Pre-Submission Consultation Stage. There would be no objection from the QB to revised wording if the examiner is so minded.*

Policy BUS3

Two aspects of this Policy appear to lack clarity. Is the first sentence a statement of fact – the plans for the GT16 area include for a new Local Centre, or is it a Policy statement that the plans for GT16 *should* include a new Local Centre? It is then said that this new Centre should be “centrally located” – is that centrally for Rackheath or centrally for GT16, and if the latter, how is this reconcilable with the content of paragraph 6.4.12?

QB Response : *No objection to removal of ‘centrally located’ to be consistent with previous wording in other policies.*

6.5 Policies: Services

Policy SER1

In response to the local authority query it has been clarified that “It is not the intention to preclude a secondary school development of over 2 storeys in height”. Given that schools must be designed to accommodate expected pupil numbers, would it be reasonable for the Policy to say: ‘School facilities should be designed so as to not dominate their surroundings and should be set within a sufficiently open space to allow their assimilation into the wider landscape’?

QB Response: *No objection to proposed wording.*

Policy SER2

Since the Policy says that any new facility should be “centrally located” [for the Parish] is a distinction being made between expanding the existing Medical Centre and another location for a new facility?

QB Response: *Yes, it is the intention that the policy does not just refer to the existing medical centre as it may be that there is a need for additional medical provision in the future which could be located elsewhere in the parish.*

Policy SER3

The first paragraph seeks to give an indication of what “utilities” are being referred to. Is there any indication that the existing community will *not* benefit, directly or indirectly, from the new

installations for electricity, water and drainage and broadband since cables and pipes surely cannot be entirely independent?

It is unclear what “utilities structures” [sic] might be? Given the expectation that any such structures should be “shielded with shrubs to maintain a rural feel” it is unclear why that couldn’t readily be achieved within open spaces?

QB Response: The intention of the policy wording is to ensure that existing residents benefits from upgraded or new services. There is no specific indication that this will not be the case currently. Utilities structures include broadband and telecoms cabinets, electricity cabinets, small water pumping stations etc which are sometimes located within footpaths or the edges of amenity areas. These could be grouped together and planned into developments e.g. within open spaces where they can be suitably landscaped rather than as an afterthought.

6.6 Policies: Transport and Access

Policy TRA1

I am not sure that the rewording of this Policy has improved it. By their nature, Neighbourhood Plans can only seek to influence planning within the Neighbourhood Area. The additional location references are outside of that boundary. The original Policy was clear that developers of new estates should [collectively?] direct their attention toward achieving improved accessibility for Salhouse station; the new Policy does not indicate how it is deliverable. Policy wordings should not use “must” unless it is evident that there is a method to *require* Policy compliance.

QB Response: The policy is intended to cover only those routes which all within the Neighbourhood Area. The map can be amended to reflect this. However accessibility to Salhouse Station within the Neighbourhood Area is an issue which will become worse when the existing road is closed (inside the Neighbourhood Area boundary) in line with the emerging masterplan proposals . No objection to reverting to a clearer form of wording.

Policy TRA2

It is unclear why the Policy says: “All major development proposals should be located where there is access to public transport services”. Arguably the railway station at Salhouse is accessible to all in the Parish, but clearly that is of limited journey value (and out of the Parish). If there is demand it is possible that bus routes could be diverted to serve new areas, so existing accessibility need not be an expectation. Would it be more reasonable to say: ‘For all major development proposals, public transport arrangements linking to the main community facilities should be included in the transport plan’, or similar?

QB Response: No objection to such wording.

Policy TRA3

The opening paragraph suggests that developers will each be responsible for the cumulative impacts from developments, current and historical. This is evidently a matter for the District Council and its masterplanning for the Triangle rather than a matter limited to any one Parish.

QB Response: Noted.

Where the Policy says “Allowance should be made for any necessary future widening of the A road along the full length of the shared perimeter with the highway by including a verge of no less than 3m width”, does the adoption standard require this? If not, who will acquire, own and maintain the additional strip of land?

QB Response: The policy intention is to ensure that the parish is properly connected. The adoption standard does not require the 3m width. Whilst developers will provide a connection from the development to the highway across the site frontage in a piecemeal fashion there are gaps between the edge of the site and the main footpath connections in the parish and there is not a fully joined up sustainable network. An example is Wroxham Road where there will be no continuous pedestrian route between Wroxham and Rackheath despite considerable development. Throughout preparation of the plan, community feedback on pavements not being joined up has been an issue. The intention of the NP is to make it as easy as possible for residents to use sustainable transport options by having verges/ pavement provision to allow for walking (plus it gives scope for bus laybys) on key routes. If development builds up to the Highway boundary this reduces the chance of sustainable options being practical and will increase car dependence as it will be the only safe option, which is a huge challenge for rural communities.

I note the objection of the Highway Authority to the double access expectation for large-scale residential and industrial developments; I read this as noting that the Highway Authority will not be bound by the expectation. The Community Council might therefore make it a Project to persuade the Highway Authority to amend their standard whilst looking to goodwill from developers to adopt the Neighbourhood Plan preference. Or the Plan could be amended to raise the threshold for a double access to accord with current local Highway Authority policy.

QB Response: This is an issue that has been raised consistently by local people. At this stage the plan could be amended to raise the threshold for the double access to accord with NCC Highway policy. At the same time the Community Council will lobby NCC to persuade them to change their standard.

Policy TRA4

Paragraphs one and four appear to duplicate each other? In relation to the first version, how is it envisaged that indiscriminate parking or any obstruction of footpaths, cycleways and pavements at all times could be “prevented”? In relation to the second version, how is it envisaged that the capacity (“the level of provision”) for on-street parking of any given road might be increased?

QB Response: it is acknowledged that it is impossible to prevent all indiscriminate parking . However it can be mitigated in part through design. The conflict between paras 1 and 4 could be resolved through the removal of criterion c in paragraph 1 . In relation to paragraph 4 the level of provision could be increased through the use of layby parking arrangements .

Project updates

No comment.

Appendices

Appendix 1

No comment.

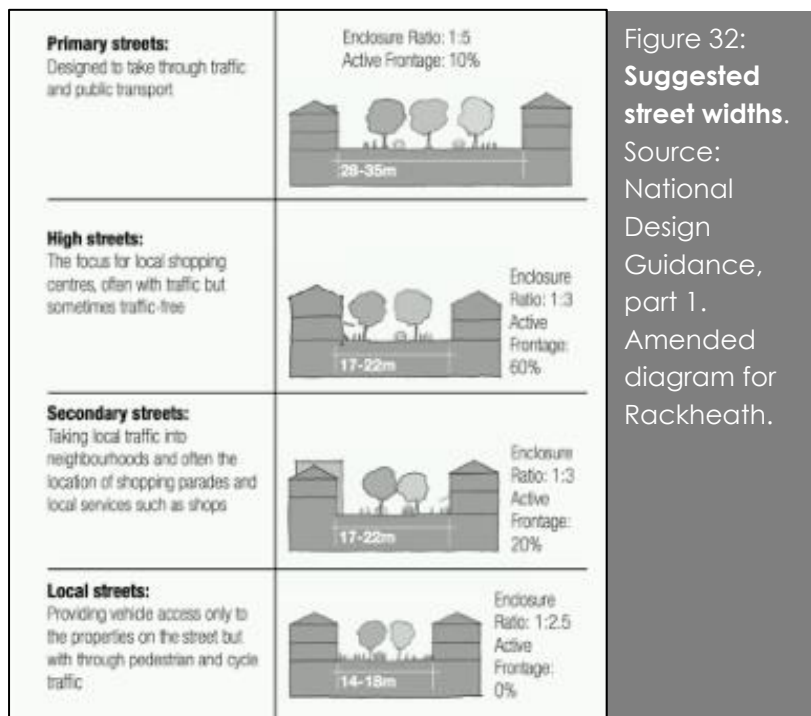
Appendix 2

Figure 32, page 30

Perhaps intentionally this figure is omitted from the on-line version of the document I accessed; are there copyright issues? There seems to be no explanation as to how the “suggested” road widths have been derived?

QB response:

Figure 32 in the Design Code. Source is the National Design Guidance, part 1 (this is where the figures come from).



Adoptable standard (p34)

It would be helpful if a hyperlink to the source of the highway standard was provided.

QB Response: See diagram above.

https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf

Appendix 3

As noted earlier, the Revised Plan will supersede the 'made' Plan and therefore the details of the already identified non-designated heritage assets ought to be included here so that the reader can understand the features that are valued and the nature of what is being protected.

I agree with Historic England that the Plan wording should not mislead as the degree of 'support' offered to proposals.

QB Response: Requested information on the proposed NDHAs is provided in a separate document .

Appendix 5

Whilst a Glossary is helpful, the version here may be over-extensive, explaining terms that are not actually included in the Plan?

QB Response : Glossary to be amended for next version of the Neighbourhood Plan

Appendix A

Extract from planning statement for WWTW at Beeston St Andrew : application number eplanning.norfolk.gov.uk/Planning/Display/FUL/2024/0025#undefined

Done 240417BeestonWWTWPlanningStatem... ▾

3.1 This planning application seeks planning permission for the following:

"Full planning application for the creation of a wastewater treatment works including associated engineering works and access"

3.2 Our client is seeking planning permission for the creation of a WwTW to mitigate the nutrient output arising from the consented urban extension to the northeast of Norwich which is set to deliver a mixed-use urban extension for up to 3,520 Dwellings.

3.3 In terms of foul water, the calculations identify that all wastewater generated by the development will be discharged within the Bure catchment. It has been identified that a site specific WwTW will be required. It is noted that, as the WwTW will require a minimum flow to operate, temporary tankering will take place to allow initial occupations. This application relates to the permanent WwTW.

3.4 The specification of this proposal has been agreed in the approved NNAMS which determines that WwTWs will operate at 90% of a bespoke license limit of 0.15mg/l for TP and 10mg/l for TN.

3.5 Planning permission has separately been sought for a wetland at Dobb's Beck which will take water from Dobb's Beck, where Rackheath WwTW also discharges. The treated effluent from the new WwTW will also be discharged in to the wetlands and supports the proposed location of the new WwtW.

3.6 The new WwTW will be constructed/managed/maintained by Severn Trent Connect who are suitably placed/qualified to do so under the Water Industry Act 1991 as a NAV. STC has played a

