

# CHET

## NEIGHBOURHOOD PLAN

### Chet Neighbourhood Plan Consultation Statement



October 2023

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## **Introduction**

### **Overview of the Chet Neighbourhood Plan**

1. Chet Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. Chet Neighbourhood Plan is a joint plan for Loddon and Chedgrave, with Loddon Town Council and Chedgrave Parish Council coming together to establish a vision and objectives for the future of the two parishes. The plan sets out how this vision will be realised through non-strategic planning policies.

### **About this Consultation Statement**

3. This consultation statement has been prepared by Collective Community Planning on behalf of Loddon Town Council and Chedgrave Parish Council to fulfil the legal obligation of the Neighbourhood planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed neighbourhood plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns raised by the persons consulted; and
  - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
  - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work, or carry on business in the neighbourhood plan area:
    - i. Details of the proposals for a neighbourhood plan;
    - ii. Details of where and when the proposals for a neighbourhood plan may be inspected;
    - iii. Details of how to make representations; and
    - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood plan; and
  - c) Send a copy of the proposals for a neighbourhood plan to the local planning authority.

5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood plan, and ensure that the wider community:
  - Is kept fully informed of what is being proposed;
  - Is able to make their views known throughout the process;
  - Has opportunities to be actively involved in shaping the emerging Neighbourhood plan; and
  - Is made aware of how their views have informed the draft Neighbourhood plan.
6. This statement provides an overview and description of the consultation that was undertaken by the neighbourhood plan steering group on behalf of Loddon Town Council and Chedgrave Parish Council, in particular the Regulation 14 Consultation on the pre-submission draft. The steering group have endeavoured to ensure that the neighbourhood plan reflects the views and wishes of the local community and the key stakeholders.

## **Summary of Consultation and Engagement Activity**

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Chet Neighbourhood Plan that was consulted upon as part of the Regulation 14 Consultation.
8. A significant amount of work went locally into engaging with the community early in development of the plan, so that it could be informed by the views of local people. Consultation events took place at key points in the development process. A range of events and methods were used.

## **Early Engagement in Developing the Plan**

Date	Activity	Summary
December 2020	Meeting with South Norfolk Council	Presentation from South Norfolk Council providing background on neighbourhood planning
April 2021	Steering group established	Steering group established to take forward a neighbourhood plan for Loddon and Chedgrave. Membership of the group changed throughout the plan's development, comprising of around 10 people, a mix of parish councillors and residents. The steering group met on a regular basis throughout development of the plan, with minutes published on the website.
January – February 2022	Consultation on area designation	Consultation locally and with statutory stakeholders on designation of the Chet area, comprising Loddon and Chedgrave parishes.
February 2022	Area designation	Area designation approved by South Norfolk Council and the Broads Authority

Date	Activity	Summary
January 2022	Website launched	<a href="http://www.chetnp.info">www.chetnp.info</a> established and contains all documents, including minutes of steering group meetings, relating to the neighbourhood plan
Throughout development of the plan	Chet contact	Regular monthly article in the Chet contact which goes to all households in the neighbourhood plan area, updating on progress with the NDP
February - April 2022	Community engagement survey	Initial engagement with the community. This included a survey with 29 questions which received 180 responses from residents, visitors and local businesses.
May 2022 onwards	Working groups	Five working groups were established for Heritage, Environment, Business, Housing, Transport & Community Facilities. The groups were led by members of the steering group and had input from a wider subsection of the community. They on a number of occasions to support development of the plan, with the environment group undertaking 4 guided walks through the NP area.
9 July 2022	Consultation event	Consultation event held in Loddon as a follow up to the survey to feedback on key issues and seek people's views on initial policy ideas for the plan. This included a focus on local green spaces, key views and design.
August 2022	Housing Needs Assessment	Housing Needs Assessment produced for the neighbourhood area by AECOM
January 2023	Design Codes Developed	AECOM were commissioned to develop design codes for the parish, included engagement with members of the steering group during visit to the parish
March 2023	Owners of Local Green Spaces informed that their land was being considered for designation within plan	Formal letters sent to all owners of Local Green Spaces.
April 2023	Consultation with the Statutory Environmental Bodies on the SEA/HRA Screening Assessment	Statutory consultation, facilitated by South Norfolk Council, which determined a SEA/HRA appropriate assessment would not be required.
May 2023	Informal comments from South Norfolk Council and the Broads Authority	Informal comments on the draft plan received from Broadland District Council, prior to Regulation 14 consultation

## **Early Engagement – Summary of the main issues raised**

9. The neighbourhood plan steering group focused on engaging residents through a consultation survey, community event, regular updates in the Chet contact and through small working groups. This was to understand what is good about the area, concerns or hopes for future development, key issues to address and ideas for addressing them.
10. The main issues and suggestions raised included:
  - The position of Loddon and Chedgrave on the river Chet is particularly valued, alongside access to green spaces and the countryside.
  - There is concern about the level of future development and the speed at which this is being delivered, and whether local infrastructure and services can keep pace with it. Many people recognise that whilst new homes are being built little is being done to expand existing services so they can cope with future demand.
  - There is strong support for new development to be more environmentally sustainable, both in terms of building practices and making use of technology like solar panels/heat pumps etc. but also in terms of incorporating green infrastructure such as trees/green space.
  - There is seen to be a lack of smaller affordable housing for younger people.
  - Design of new homes is important, particularly ensuring they are in keeping with the historic character of Loddon/Chedgrave, and that they are sustainable.
  - There is strong support for protecting the natural environment, trees, hedgerow and green spaces and also for establishing green corridors.
  - Walking and cycling facilities are important locally, with many frustrated about the ongoing closure of Wherryman's Way, and several suggestions for new/improved cycle links.
  - It's important to encourage more small and medium sized businesses, with an emphasis on provision of local employment opportunities.
  - Visitors/tourists are considered important to the area, though there are mixed views on the provision of more holiday accommodation locally.
  - Community activities and facilities appear well used, though there is a perceived need for more activities for younger people and support for a leisure centre/swimming pool.

## **Early Engagement – how this was considered in development of the pre-submission plan**

11. Community support for more sustainable development led to this being a key focus. The plan supports more environmentally conscious design/build for new development, but also retrofitting for existing housing stock and community renewables. The plan is ambitious about achieving a shift towards zero carbon.
12. Following feedback from residents on the importance of the local environment and preserving this, the steering group decided to designate local green spaces within the plan. The steering group considered the spaces suggested by residents during consultation and assessed these in line with national policy. Local Green Space owners were also formally written to, with their feedback considered in finalising the plan. As well as identifying important green spaces the steering group

decided to develop green corridors for the plan, with these based on mapping evidence provided by Norfolk Biodiversity Information Service. The aim is for biodiversity improvements to be prioritised along these green corridors.

13. There is real concern about the level of planned (and speculative) development within the two parishes and the neighbourhood plan is seen as a way of influencing with respect to design and mix. Feedback in relation to design, and particularly that buildings should be in keeping with existing characteristics of the area, was fed into the work on developing Design Codes. This was led by AECOM, but members of the steering group met with AECOM to undertake an initial walk around and identify key priorities. The steering group also provided photos and made comments to help refine the codes.
14. Feedback in relation to housing mix and type from residents was considered alongside a Housing Needs Assessment developed by AECOM to establish a policy that will ensure future housing more effectively meets local need.
15. The importance of local services and businesses to residents and visitors led to policies being included that support retention and growth of these. This includes a identified retail route and identification of key employment areas.

## **Regulation 14 Consultation**

### **Overview**

16. The consultation ran for just over 8 weeks from 5 June 2023 to 30 July 2023.
17. The activities undertaken to bring the consultation to the attention of local people and stakeholders is set out below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Date	Activity	Summary
4 June 2023	<ul style="list-style-type: none"> <li>• All relevant documents and link to the online survey were published on neighbourhood plan website.</li> <li>• Hard copies of draft NDP, summary document and consultation survey were placed in the library, Chet Stores and Loddon Town Council offices.</li> <li>• A hard copy of all relevant NDP documents were made available at Loddon Town Council offices.</li> <li>• Advert placed on the Loddon Eye and Chedgrave facebook sites.</li> </ul>	<p>Various methods were used to bring the Regulation 14 Consultation to the attention of local people. All methods stated the consultation dates, where NP documents could be accessed and how to respond.</p> <p>People were able to make representations by:</p> <ul style="list-style-type: none"> <li>• Completing an online survey.</li> <li>• Filling in a hard copy of the survey or electronic version of the survey and sending this to the Steering Group Chairperson.</li> <li>• Providing feedback via letter or electronically to the parish clerk.</li> </ul> <p>The NP documents made available as part of this process included<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• Regulation 14 version of the Neighbourhood Plan</li> <li>• Design Guidance and Codes</li> <li>• Housing Needs Assessment</li> <li>• Local Green Space Assessment</li> <li>• Views Assessment</li> <li>• Evidence Base</li> </ul>
	<ul style="list-style-type: none"> <li>• Emails and letters sent to stakeholders advising them of the Regulation 14 consultation and how to make representations.</li> </ul>	<p>An email or letter was sent directly to each of the stakeholders, including statutory consultees, supplied by Broadland District Council, in addition to local stakeholders. The email/letter informed the stakeholders of the commencement of the consultation period. The email notified consultees of the NP's availability on the website, alongside supporting materials, and highlighted different methods to submit comments. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 24 April. A copy of this is provided in <b>Appendix A</b>.</p>
	<ul style="list-style-type: none"> <li>• Article included within the Chet Contact</li> </ul>	<p>Article providing all relevant details about the Regulation 14 Consultation was included within the Chet Contact, which is distributed to all households in the parish. A copy of this is available in <b>Appendix B</b>.</p>
	<ul style="list-style-type: none"> <li>• Posters</li> </ul>	<p>Posters and banners were displayed in key places throughout the parish advertising the consultation, providing all the relevant details. See <b>Appendix C</b>.</p>

<sup>1</sup> <http://lingwoodburlingham.com/documents.html>



Date	Activity	Summary
8 June 2023	<ul style="list-style-type: none"> <li>Consultation event in Chedgrave at the Church Rooms</li> </ul>	Consultation event which included a presentation on the key policy areas of the plan, question and answer session and display boards with a copy of the plan. 24 people attended. See <b>Appendix D</b> .
10 June 2023	<ul style="list-style-type: none"> <li>Consultation event in Loddon</li> </ul>	Consultation event which included a presentation on the key policy areas of the plan, question and answer session and display boards with a copy of the plan. 41 people attended.

## **Feedback from Regulation 14 Consultation**

18. Fifteen stakeholders wrote to the steering group with their comments on the draft plan, either in letter or email form. In addition, 33 residents responded to the online survey.

19. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.

## **Statutory Stakeholders**

### **Anglian Water**

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 1	As a region identified as seriously water stressed, we encourage development plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/storm water harvesting and reuse, and greywater recycling. The emerging Greater Norwich Local Plan requires new development to meet the optional higher standard of 110 litres per person per day. We would encourage this standard to be included in the neighbourhood plan using a fittings-based approach. This would also align with the Design Guidelines and Codes 4.4.2 Features in dwellings - which highlights more ambitious water efficiency standards in Figure 93.	Added this detail and reference to 110l/p/day in the supporting text.
Policy 3	<p>Anglian Water is supportive of the policy aims, particularly the requirement for multi-functional green infrastructure and sustainable drainage systems (SuDS) in new development to manage surface water effectively on site, whilst achieving benefits for biodiversity and amenity and opportunities for rainwater/storm water harvesting and reuse.</p> <p>We suggest the following amendments would strengthen and clarify the policy position:</p>	Made the policy wording amendments and added in reference to the design code.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<ul style="list-style-type: none"> <li>New developments must seek to reduce flood risk overall through creation of multifunctional green and blue infrastructure and including SuDS.</li> <li>New build properties should contribute to sustainable drainage by avoiding impermeable surfacing within private gardens and driveways and by installing domestic-scale SuDS which can include planters and rain gardens. Water harvesting, re-use and recycling should be incorporated into scheme design wherever feasible.</li> </ul> <p>Anglian Water would recommend that the Loddon and Chedgrave Design Guidance and Codes are referenced in the policy and/or the supporting text to signpost applicants/developers to the appropriate information in 4.2.6 Sustainable Drainage in Streets and 4.4.5 Rainwater Harvesting.</p>	
Policy 7	Anglian Water supports the policy and prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within the Blue/Green Corridors. We would recommend that the wording for c. Should reference 'ecological function' of the Blue/Green corridor to provide clarity.	Made the change
Policy 8	Anglian Water note that the policy qualifies that temporary engineering operations are appropriate within LGS areas, which is consistent with national green belt policy. It is considered that operational development by Anglian Water to maintain or repair our infrastructure within the proposed LGS areas, should be supported by the policy.	Yes, noted.

#### Avision Young on behalf of National Grid

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET. NGET has identified that it has no record of such assets within the Neighbourhood Plan area.</p>	Noted

## Broads Authority

Stakeholder comments to the Regulation 14 consultation	NDP Response
Detailed comments: Throughout – please ensure all images have alt text.	Amended.
Front Cover – do you think under the date you might want to say something like ‘A Neighbourhood Plan for Loddon and Chedgrave’, just so it is clear from the start? Like a tag line almost.	Amended.
Para 3, 77 – does the Census 2021 data provide more up to date and accurate population figures?	At the point of Reg 14 it was not available for this area. However, we have reviewed the Census 2021 data available via build profiles and estimates. This has been included in the evidence base and NP. Overall whilst % and numbers were slightly different they still were similar in general terms with what the NP is trying to achieve e.g., the population has increased, Chedgrave has a more ageing population than Loddon etc.
Para 17 – extra word – ‘Of the 3,679 new homes, Loddon/Chedgrave <del>is</del> will deliver at least 240 across two sites.’	Amended.
Para 24 – lists one issue and concern and housing is missing a g. Should there be more issues and concerns?	This was an error - copied and pasted the list of issues from the previous consultation survey now. This text is now included within this Consultation Statement rather than the main plan document.
Para 30 – local plans – plural	Amended
Para 31 – says ‘Working towards a net zero emissions’ – remove the ‘a’?	Amended
<b>Objection.</b> Policy 1 - is contrary to our policy SP15 as Policy 1 proposes dwellings outside of the development boundary. Also, DM42 of the Local Plan for the Broads says that ‘custom/self-build dwelling proposals will be considered in accordance with other policies in the Local Plan on the location of new dwellings’. This part of Policy 1 could also be contrary to NPPF para 80. We feel this	The District Council didn’t object to this element of the policy, and we’ve included similar policies elsewhere. We have amended the policy so that it specify

Stakeholder comments to the Regulation 14 consultation	NDP Response
needs to be removed as there does not seem to be justification for a policy stance contrary to local and national policy.	applies to development outside of the BA area.
<a href="#">Para 89 – you might want to refer to our planning guides as well: Broads planning guides (broads-authority.gov.uk)</a>	Referred to the guide.
Para 100 – you could refer to our biodiversity enhancements guide (linked above)	Referred to the guide.
Para 102 says ‘growth wilder’ – think this should say ‘grow wilder’	Amended
Para 104- some cross throughs shown – formatting issue	Amended
Policy 11 - says ‘All applications should be accompanied by a statement that clearly provides evidence that alternative uses have been explored due to employment uses are not viable’ – the yellow bit does not seem to make sense. Maybe it should say ‘not being viable’?	Changed wording.
Para 154 – refers to policy 13, but think that should say policy 14?	Amended.
Policy 17, a – think you mean ‘like for like’.	Amended.
Policy 17, d – ‘such as UPVC’?	Amended.

## Historic England

Stakeholder comments to the Regulation 14 consultation	NDP Response
Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle and note the extensive and detailed references to the historic environment. We welcome the approach you have taken however owing to staff vacancies, we do not currently have capacity to provide a more detailed comment.	Noted.

## National Highways

Stakeholder comments to the Regulation 14 consultation	NDP Response
No comment	Noted

## Natural England

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General	No specific comments on the draft NP.	Noted.

## NHS Norfolk and Waveney Integrated Care System (ICS) Estates Department

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General	Comments are on behalf of the Norfolk and Waveney ICS, incorporating Norfolk & Waveney Integrated Care Board (ICB), Norfolk Community Health and Care (NCHC),	

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	Norfolk & Norwich University Hospital NHS Foundation Trust, Norfolk and Suffolk NHS Foundation Trust and the East of England Ambulance Service NHS Trust (EEAST).	
General	<p>The local Primary Care Network (PCN) that would cover the health needs of the Chet NP area residents is the SNHIP PCN, and is a collaboration between primary, secondary, community, social, voluntary, and mental health care providers to form an integrated health and social care service to patients.</p> <p>Following a review of the information available I note that, the provision of healthcare services is currently serviced by Chet Valley Medical Practice; in terms of premises space the demand and capacity data indicates that this practice currently has capacity and the majority of residents within the Chet neighbourhood plan boundary from new developments, will be expected to register and visit a local GP.</p> <p>With the addition of new developments in and around the area in the near future, capacity issues do have potential to arise. The PCN are looking at ways to better integrate the community teams with primary care provision.</p>	<p>Note the detail and added this where relevant/necessary regarding healthcare services. (Para 168)</p> <p>Note the potential capacity issues.</p>
Objectives	One of the objectives listed in the draft neighbourhood plan is to 'ensure there is adequate infrastructure to meet community needs'. This is further supported in policy DM3.17 of the South Norfolk Local Plan which states 'resistance to development proposals that would lead to the loss of community facilities', and policy DM3.16 defines important local community services and facilities as buildings in use as or last used as a primary school, local convenience shop, bank, post office, public house, rural petrol filling station, community hall, indoor sports hall, theatre, cinema, cultural facility, and small-scale health facilities. The ICS strategic estates workstream welcome the inclusion of the local doctor's surgery that is designated as a community facility.	Welcome the comments.
PG25/ General	Page 25 of the draft plan references the ageing population within Chet NP area. It should be noted that this can put	Noted the pressure from an ageing

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>increasing pressure on existing healthcare services and also on existing constrained ambulance services and their nationally set blue light response times.</p> <p>It is noted that there is a good range of services located in Loddon, which includes a medical centre, however further detail indicates concerns from residents regarding accessibility to these services including health, once the population grows. Furthermore, the draft plan supports the expansion of health services and this is seen as a priority by residents.</p> <p>The joint core strategy includes policy 7 which requires that accessible health facilities are provided. Local discussions regarding land adjacent to the current Chet valley medical practice have proposed a medical/social services hub building and that it would be supported by residents. Whilst the ICS strategic estates workstream welcome these comments, the NHS would require capital funding via the community infrastructure levy to support such plans.</p>	<p>population added this to Para 84.</p> <p>Note the comments on capital funding to support such plans related to the land adjacent to the current Chet Valley medical centre.</p>
General	<p>The ICS would welcome the addition of a simple statement to confirm that Chet Parish Council will support the ICS in ensuring suitable and sustainable provision of healthcare services across all health sectors for the plan area residents, as per the comments in the 'Access to public services' and with reference to Policy 16 of this draft plan, through the utilisation of local CIL (community infrastructure levy) developer contributions.</p> <p>If unmitigated, the impact of developments on healthcare services in and around the Chet neighbourhood plan area would be unsustainable, including that of Primary care, Community care, Mental health, Acute care and the Ambulance service.</p>	<p>Do not agree to spend CIL money on what is an NHS building</p>

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
Public Health	<p>Neighbourhood Plans should support healthy behaviours and aim to reduce health inequalities; therefore, they could consider:</p> <ul style="list-style-type: none"> <li>• Quality and affordable housing: associated with improved quality of life, mental health, and clinical health-related outcomes</li> <li>• Improved transport and accessibility: increased social connections and encouragement to walk and cycle</li> <li>• Social infrastructure provisions: enable residents to have good access to service and opportunities for social interaction and sense of community</li> <li>• Economic activity: a range of employment opportunities within the neighbourhood or accessible by sustainable travel</li> <li>• Natural environment: access to high quality green space can increase physical activity, provide opportunity for local food growing, address air quality issues and contribute to nature conservation and biodiversity</li> <li>• Climate resilience: address warm summers and cold winters. Build resilience into the community, for example flood risk mitigation.</li> <li>• Health inequalities: specific consideration of vulnerable groups, for example elderly people or deprived areas</li> </ul> <p>Reference to health can be included throughout the Neighbourhood Plan or the health elements can be drawn together into one section within the plan to be easily accessible and show full consideration of health.</p>	<p>This looks like standard guidance, which is helpful, but not specifically related to the text and policies within the draft NP.</p>
Lead Local Flood Authority	<ul style="list-style-type: none"> <li>• Welcomes the reference to flooding from various sources. However, there is no reference to groundwater flooding.</li> <li>• The LLFA welcome the information contained within the document relating to flood risk, the</li> </ul>	<p>Welcome and note the comments.</p> <p>We have not found any publicly available information</p>

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>inclusion of the 'Managing Flood Risk in a Changing Climate' Section, and in particular Proposed Policy 3: Managing Surface Water Flood Risk which refers to the need for developments to give consideration to flood risk and drainage and the implications of climate change. Furthermore, the LLFA welcomes the references made to the use of SuDS within developments and the inclusion and benefits of SuDS features such as permeable surfacing, rain gardens and attenuation ponds.</p> <ul style="list-style-type: none"> <li>• Whilst the LLFA also welcome the inclusion of surface water flood risk mapping in Figure 5, we note that this is in the form of a map extract and does not cover the whole of the Chet Neighbourhood Plan area.</li> <li>• The LLFA further welcome that Policy 3: Managing Surface Water Flood Risk, Policy 7: Biodiversity and Blue/Green Corridors and Policy 8: Local Green Spaces of the document all recognise the vital role that Blue and Green Corridors and Local Green Spaces play in mitigating flooding by intercepting and slowing down run-off in high rainfall events, as well as the multiple benefits which incorporating SuDS into new development can have for wildlife, biodiversity and recreation. A network of Green Corridors being proposed within the Parish as part of the Neighbourhood Plan is identified in Figure 7.</li> <li>• The LLFA consider that Policy 3 could be further enhanced by the Policy text making direct reference to developments seeking to achieve the four pillars of SuDS.</li> <li>• It is noted that the River Chet (an Environment Agency main river which is identified in the document as being an attractive visual feature and playing an important role for leisure and tourism in the area) flows through the Chet</li> </ul>	<p>addressing groundwater flooding.</p> <p>Regarding the comment made about Figure 5, additional maps are included within the evidence base.</p> <p>Recommend adding in any additional detail LLFA has given in this submission.</p> <p>Added a map of surface water flooding which covers the whole of the NP area.</p> <p>Made a direct reference in Policy 3 to developments seeking to achieve the four pillars of SuDS.</p> <p>Added a map that clearly identifies the Flood Zones and the River Chet.</p> <p>Added reference to the guidance documents recommended by LLFA.</p>



NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Neighbourhood Plan area and separates the Parishes of Loddon and Chedgrave.</p> <ul style="list-style-type: none"> <li>• Welcomes reference made in the document complimenting strategic policies and Local Plans.</li> <li>• The LLFA welcome that reference is made in the document to the need for guidance of relevant Agencies such as the LLFA and Environment Agency be adhered to in respect of flood risk management, drainage, and flooding matters, with reference also made to relevant documents such as the Greater Norwich Area Strategic Flood Risk Assessment. It is noted in the Chet Neighbourhood Plan Draft document to the majority of the plan area being within in Flood Zone 1 on the EA mapping, with areas in parts of Loddon and Chedgrave close to the River Chet and The Broads being located within Flood Zone 3, the LLFA consider the document would be enhanced through the inclusion of relevant mapping within the Neighbourhood Plan document clearly identifying this.</li> <li>• The LLFA are not aware of AW DG5 records within the Parishes of Loddon and Chedgrave however, this will need to be confirmed with/by Anglian Water.</li> <li>• The LLFA recommend reference to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1' within the Neighbourhood Plan (or the relevant updated version depending on the timeframe for the preparation and adoption of the final Neighbourhood Plan document) regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the "Information for developers" section of the Norfolk County Council website.</li> </ul>	

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<ul style="list-style-type: none"> <li>According to LLFA datasets (extending from 2011 to present day) we have 9 no. record of internal flooding and 11 records of external/anecdotal flooding in the Parishes of Loddon and Chedgrave. The LLFA highlight the importance of considering surface water, groundwater, and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.</li> <li>We advise that Norfolk County Council (NNC), as the LLFA for Norfolk, publish completed flood investigation reports here. According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parishes of Loddon and Chedgrave.</li> <li>Whilst we note that whilst some flood risk mapping has been included, the LLFA recommend that mapping be provided for all sources of flooding including surface water, fluvial and groundwater, with the mapping covering the entirety of the Neighbourhood Plan Area.</li> <li>If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.</li> </ul>	
Historic Environment Officer	<p>Recommend:</p> <ul style="list-style-type: none"> <li>Study Historic England's published guidance and consider how the plan can take its advice on board.</li> <li>Contact the Norfolk Historic Environment Record and request information on heritage</li> </ul>	<p>Note the recommendations.</p> <p>The plan in para 174 does allude to the fact that the NHER contains a detailed account of the area's history</p>

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>assets within the plan area. The website only gives a selected number of records.</p> <ul style="list-style-type: none"> <li>Consider the full range of heritage assets within the plan area and identify those they feel are most significant.</li> </ul> <p>Section 10 of your plan:</p> <ul style="list-style-type: none"> <li>There is no mention of the rural Roman and medieval settlement sites which are known of to the west and south of Loddon. These are shown on the NHER.</li> <li>Policy 17 only covers archaeological sites within the conservation areas, whereas a large number of archaeological sites also exist outside the conservation areas.</li> <li>Paragraph 170 mentions a network of prehistoric footways. That is potentially very significant, have you got a reference for that?</li> </ul>	<p>including through the roman period. However, we have added reference to the rural roman and medieval settlement sites and further detail.</p> <p>Policy 17 is specifically about the Conservation Area.</p> <p>The reference for the prehistoric footways has been changed to ancient footways.</p>
Minerals and Waste	<p>Norfolk County Council as the Minerals and Waste Planning Authority has no objections to the Chet (Loddon and Chedgrave) Neighbourhood Plan (Regulation 14 Draft Version).</p> <p>However, it should be noted that local green spaces "Loddon and Chedgrave Sports Field" (approximately 2.6 hectares) and "Green space behind Grebe Drive" (approximately 6.2 hectares) are underlain by sand and gravel resource (see map below, 5.2). Since the allocation is for local green space, it does not sterilise the mineral resource underlain. However, if a planning application was to be submitted for built development policy CS16 "safeguarding mineral and waste sites and mineral resources" (or any successor policy) of the Minerals and Waste Local Plan would apply.</p>	Noted.

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>Natural Environment Team</p> <p>Ecology</p>	<ul style="list-style-type: none"> <li>Objectives are supported</li> <li>Policy 7 is supported noting that Figure 11 provides a very useful focus for delivery of off-site Biodiversity Net Gain requirements where developers are unable to deliver on-site BNG, as well as a focus for community environmental projects and action.</li> <li>It is also recommended that the Parish Council engages in the development of the emerging Norfolk Local Nature Recovery Strategy (LNRS), as the Green Infrastructure (GI) mapping work already prepared in this Neighbourhood Plan is likely to complement the county-wide strategy</li> </ul>	<p>Welcome the support.</p> <p>PC to consider the engagement in the LNRS.</p>
<p>Natural Environment Team</p> <p>Landscape</p>	<ul style="list-style-type: none"> <li>Objectives are supported</li> <li>Policy 6 is supported and it is encouraging to see the consideration of settlement edge density, views and access to the local surrounding landscape, cohesive boundary treatments that don't obscure views and maintaining a sense of place and identity for the villages through design.</li> <li>Policy 7 Biodiversity and Blue/Green Corridors and Figure 11 provide a strong basis on which to protect and enhance the important opportunities for Green and Blue Infrastructure.</li> <li>Policy 8 Local Green Spaces is broadly supported and the evidence for each space being designated appears robust and well considered.</li> <li>Policy 9 Protection of Key Views, linked with Policy 6 it is encouraging to see that important public views have been identified (as on Figure 14) and that these take into account views whilst using public access, views of important landmarks and views from key areas.</li> </ul>	<p>Welcome the supportive comments on the objectives and various policies.</p>

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<ul style="list-style-type: none"> <li>Policy 13 Protection and Enhancement of Public Rights of Way and Policy 15 Walking and Cycling Improvements are encouraging to see and Norfolk County Council Public Rights of Way officers and Cycling and Walking Officers look forward to working with the villages in the future to best achieve this.</li> </ul>	

## South Norfolk Council

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General - accessibility	<p>Since the introduction of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, all public bodies (including parish/town councils and district councils) need to ensure that any web content (including documents available for download) meets the <a href="#">Web Content Accessibility Guidelines (WCAG) 2.1</a> accessibility standard.</p> <p>Currently the document doesn't appear to meet this standard and this will be something for the parish councils to consider when publishing future Neighbourhood Plan documentation to their websites.</p> <p>Certainly, before South Norfolk Council can accept and publish the Neighbourhood Plan submission documents, at the Reg. 15 / Reg. 16 stages, these documents should have been made fully accessible, in line with the WCAG 2.1 guidelines. Guidance on ensuring your documents are accessible can be found here:</p> <ul style="list-style-type: none"> <li><a href="#">How to use the built-in Microsoft accessibility checker.</a></li> <li><a href="#">How to use the Adobe Pro accessibility checker</a></li> <li><a href="#">How to make PDFs accessible in Adobe Pro</a></li> </ul> <p>Also attached is a guidance note that the Council has produced on WCAG and Neighbourhood Plans.</p>	Addressed the accessibility concerns.
Page 6 – Paragraph 24	The list of issues stops suddenly, is this complete? Typo of 'Housin'	Yes this was an error, list of issues now contained within Consultation Statement rather than main plan document.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Page 7 – Vision	The vision is very concise but does not feel locally specific. Consideration could be given to expanding the vision. For example, are there any issues of particular importance to the area (historic environment or natural environment for example) that could be highlighted? This will help make the vision more unique to the area and highlight the specific qualities of the area and Plan.	Updated the vision slightly, but in essence a short vision is what the group wishes to see.
Page 11 – Photo	It is felt it would be better to have a photo of new housing with integrated panels that are well organised. This photo does not illustrate well-co-ordinated design as it shows surface mounted panels that are also in two different areas of the roofs.	There are no other examples of solar panels delivered on new build housing in the NP area currently, which is partly why there is such a focus on this.
Page 14 – Policy 1 Sustainable Design and Building Practices	<p>This is a very detailed policy and it is laudable to see issues relating to sustainability being dealt with to such a degree within the Neighbourhood Plan.</p> <p>However, on reflection, the Council has a concern that the provision of such a statement (first paragraph) cannot be made a requirement within the application validation process. It is therefore suggested that the start of the policy is slightly re-worded so that the focus is on achieving the elements raised within the bullet points. The Council suggests amending the introductory sentence to: ‘All new housing development should maximise its environmental sustainability by:’ The subsequent bullet points would then set out the mechanisms through which this can be achieved. The supporting text could encourage the completion of a sustainability statement through which to demonstrate this.</p> <p>First paragraph; second bullet – it would be important to specify that such materials should be locally sourced (as they often are not, meaning the shipping could outweigh the aspiration for sustainable building practices).</p> <p>First paragraph; third bullet – it is not clear what is meant by ‘adopting the use of low and zero carbon energy technologies’, given sustainable materials and renewable energy has already been addressed in the previous bullet points. Is this related to adaptive buildings in response to</p>	<p>Para 1: Revised this in line with the comments, and updated the supporting text to provide further guidance as to what is required by the policy. Some bullets deleted, others revised to make more concise.</p> <p>Para 2: Moved specific examples of the energy hierarchy to the supporting text.</p> <p>Para 3: Reworded the third paragraph relating to self-build schemes.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>changes in the environment? It is considered that this needs clarifying.</p> <p>First paragraph; fourth bullet – again, it is felt this needs clarifying as it is not immediately obvious what is meant. Can an example be provided?</p> <p>First paragraph; fifth bullet – in order to help improve the clarity of the policy, it would be beneficial to set out examples of waste that the policy looks to address (e.g. spoil, packaging, disused/broken materials etc.)</p> <p>Second paragraph – it is not considered necessary to list the specific elements of the energy hierarchy within the National Design Guide – these can be referred to in supporting text, if necessary. This would also help to make the policy more concise.</p> <p>Third paragraph –As currently worded, this would potentially permit any number of self-build schemes to come forward outside and adjacent to the settlement limit. In addition, and in order that this remains in general conformity with strategic policies, the Council suggests that this statement includes the condition that exceptions should only be allowed where they meet or contribute to the meeting of an identified and demonstrable local need.</p> <p>Fourth paragraph – this statement regarding shared heating systems may be better placed within the list of bullet points under the first paragraph.</p> <p>Part 2 – Retrofitting Existing Buildings – how should alterations to existing buildings show that they have considered energy reduction?</p>	<p>Para 4: Moved fourth para to the bullets under para one as suggested.</p> <p>Part 2: Supporting text updated to request that this is demonstrated as part of the planning application, eg through Design &amp; Access Statement.</p>
Page 19 – Policy 3 Managing Surface Water Flood Risk	<p>This is another detailed policy. It is very positive to see the consideration of the biodiversity benefits of SuDS as well as the potential landscape benefits.</p> <p>Third paragraph – the Council would agree that attenuation ponds should not normally be considered as meeting open space requirements. However, it would be worth clarifying in a footnote what the ‘safety standards’ constitute.</p> <p>Fifth paragraph – there is no mention of rainwater harvesting here through, for example, the inclusion of water butts in new properties.</p>	<p>Noted.</p> <p>For the third paragraph, added in the footnote details around the safety standards of open water planning.</p> <p>Added reference to rainwater</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
		harvesting in fifth para.
Page 23 – Para. 72	<p>The Council would challenge the statement, ‘limited long term need for affordable rent’, bearing in mind rising interest rates reducing access to home ownership.</p> <p>Figure 7 – ‘Rent to Buy’ is not currently delivered in South Norfolk by any housing association. Therefore, it might not be achievable.</p>	<p>Reviewed Para 72.</p> <p>Fig 7 is taken from the AECOM HNA. However, referred in the text to the fact rent-to-buy is not delivered in SN.</p>
Page 24 – Policy 4 Affordable Housing	<p>As regards the tenure mix highlighted in the first paragraph, it should be noted that affordable housing needs to meet district-wide need, including other surrounding parishes (some without a site proposed for allocation within the Development Plan). With this in mind, the Council would encourage some flexibility in terms of this requirement. It is suggested that the following wording is added to the end of the first paragraph (following the two bullet points):</p> <p>‘Alternative tenure mixes of affordable housing will be supported where they are justified by the most up-to-date evidence of housing need.’</p> <p>As regards the second paragraph, it should be noted (via a reference within supporting text) that local eligibility criteria can only apply for a maximum of three months - <u>First Homes - GOV.UK (www.gov.uk)</u> Paragraph: 008 Reference ID: 70-008-20210524</p> <p>Typo in criterion b) - ‘wo’</p>	<p>Steering group has decided to retain current wording as would like the tenure mix to reflect the local HNA. This is currently the most up to date evidence.</p> <p>Made it clearer that eligibility criteria applies to First Homes.</p> <p>Amended typo for criterion b</p>
Page 25 – Para. 79	<p>The Council queries the statement that there is no need for 1-bedroom homes. They are more affordable, especially for small households with one income. On what evidence was this conclusion reached? It should be noted that Housing Benefit cannot be paid for a spare bedroom.</p>	<p>This reflects the findings of the HNA developed by AECOM.</p> <p>We’ve already addressed this point about there being a need for flexibility around the size of homes</p>



Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
		such as 1 beds in Para 80.
Page 32 – Policy 6 Design	<p>Criteria g) – ‘Innovative design, bold even, is supported...’ – its’ recommended that this wording is changed slightly in order to provide clarity. Suggest the wording is changed to: ‘Innovative and bold design is supported so long as...’</p> <p>The final paragraph of the policy makes reference to affordable housing being well-integrated and sensitively designed, which is positive. This is often referred to as being ‘tenure-blind’ and it would be useful to use this wording in the policy. Another element that could be included is the expectation that affordable dwellings should be distributed around development sites, but that small clusters of dwellings may be appropriate on larger sites.</p>	<p>Amended wording for criteria G.</p> <p>Used the term tenure-blind in the final paragraph.</p>
Section 7 – Protecting our green spaces and providing more places where wildlife can flourish	<p>This is a very well detailed section outlining the various benefits of protecting habitats and biodiversity, not just to nature but also to the local population.</p> <p>The following constitute other ideas that the Neighbourhood Plan group may wish to reference within this chapter:</p> <ul style="list-style-type: none"> <li>• Use of native species, or those with known value to biodiversity (e.g. RHS bee friendly plants, which maximise the flowering period). This is specific and would feed into the aims of the Chet Valley bee line.</li> <li>• Encouraging natural regeneration on development adjacent to green corridors.</li> <li>• The use of green hay on sites, or specific seed mixes depending on the soil type.</li> <li>• Using buffers between development and any adjacent CWS which is set aside for wildlife. Hedges could have a buffer too, and not be incorporated within the curtilage of dwellings.</li> <li>• Siting any new woodlands next to existing conservation features such as ponds or meadows (<a href="https://www.norfolkwildlifetrust.org.uk/documents/nature-recovery-network/wildlife-advice/trees-and-woodland/woodlands-for-wildlife">https://www.norfolkwildlifetrust.org.uk/documents/nature-recovery-network/wildlife-advice/trees-and-woodland/woodlands-for-wildlife</a>).</li> </ul> <p>Encouraging the restoration of any ‘ghost ponds’ within the proximity of development proposals (<a href="https://www.norfolkwildlifetrust.org.uk/documents/nature-recovery-network/wildlife-advice/landscape-connectivity/norfolk-wildlife-trust-community-guide-to-landscap">https://www.norfolkwildlifetrust.org.uk/documents/nature-recovery-network/wildlife-advice/landscape-connectivity/norfolk-wildlife-trust-community-guide-to-landscap</a>)</p>	<p>Added in additional links/information where possible.</p>

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Page 33 – Para. 94	<p>SSSIs are designated under the Wildlife &amp; Countryside Act 1981 where they support habitats and/or species of national importance (i.e. there are statutory designated sites within the neighbourhood area).</p> <p>The Broads SPA is within 1km of Chedgrave, just outside the parish boundary, so it might be beneficial to clarify the statement e.g.</p> <p>....'while no statutory designed sites are located within the parish boundaries of Loddon and Chedgrave, the Broads and Hardley Flood Site of Special Scientific Interest, which is a component site of the Broads SAC, is located adjacent to the ward boundary to the east'...or similar.</p>	Noted made the change.
Page 36 – Para. 98	Ideally, native species from local sources/stock should be planted. Species should also reflect the local character of the area.	Noted/Added.
Page 36 – Para. 99	<p>The current timescales for the implementation of Biodiversity Net Gain are as follows:</p> <ul style="list-style-type: none"> <li>Major sites: from November 2023</li> </ul> <p>Nationally Significant Infrastructure Projects: from November 2025 (subject to consultation)</p>	Noted. Reviewed BNG timescale.
Page 37 – Para. 102	<p>There is a typo in the second sentence: '...grassland areas to growth wilder...'</p> <p>Bird and bat boxes are secured under planning policy rather than mandatory Biodiversity Net Gain. These are elements that could be required through Neighbourhood Plan policy, where appropriate and proportionate.</p>	<p>Amended typo.</p> <p>Updated reference to bird/bat boxes being secured.</p>
Page 38 – Policy 7 Biodiversity and Blue/Green Corridors	<p>The policy provides strong protection for habitats and biodiversity. Has it been considered if the policy could also encourage how any net gains could also be integrated to help provide benefits for the local population or the wider landscape as has been alluded to in the supporting text? The supporting text has made good reference to the benefits of biodiversity for leisure and wellbeing as well as mitigating the effects of climate changes, such as flooding. The policy could be enhanced by encouraging how these elements could all be considered holistically.</p> <p>Could consideration be given to how the identified corridors could be connected to provide benefits for nature and people? Land could potentially be improved for biodiversity to create new 'stepping stones'.</p>	Para 105 talks about the community benefits of corridors. Added some text to the policy about delivering wider community benefit by connecting people with nature along corridors, where appropriate.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Paragraph 94 identifies that there are a number of important designations within the plan area. It would be beneficial for these to be clearly demarcated on figure 11 to demonstrate how the identified green and blue corridors help ensure the connectivity of these sites. The Council also considers that it would be beneficial to provide further explanation of how the information contained in figure 12 has been used to inform figure 11. This will help demonstrate that the policies of the plan are underpinned by relevant and up-to-date evidence. The Council also notes the policy seeks to encourage off-site BNG to be delivered along these green corridors as a first preference. Further evidence that illustrates the ecological or habitat important of these corridors and the sites along them would help to demonstrate these are appropriate to be established in policy as being of high strategic significance in the context of the emerging BNG metric.</p> <p>The final paragraph of this policy could be reordered. The final statements referring to the presumption to protect and incorporate trees and hedgerows should be at the forefront as this is key to protecting green corridors. Putting these first may also help cover the policy if an applicant, for whatever reason, decides not to provide an arboricultural assessment. The reference to the arboricultural survey could also be reworded in order to be more concise and direct – ‘An Arboricultural Impact Assessment, conducted by a suitably qualified person, should be submitted with planning applications to establish the quality of trees and hedgerows on the site and identify a suitable management plan.’</p> <p>In addition, and as raised previously, the Council considers that it would be useful to clarify that any assessment should be proportionate to the scale of the proposal and the tree(s)/hedgerow affected.</p>	<p>Added the wildlife designations to Figure 11</p> <p>We used all the available evidence to develop the green corridors – we’re also building on what’s already here – ie we’ve got the Chet and this is part of the corridor network, we’ve got the B-Line, this is part of the network.</p> <p>Reordered the final paragraph.</p> <p>Reworded the sentence around arboricultural assessments.</p> <p>Included requirement that assessment should be proportionate to the scale of the proposal and the tree(s)/hedgerow affected.</p>
Page 37 – Paragraph 104	Typos – Line through paragraph number. Line after second sentence.	Amended.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Page 52 – Policy 8 Local Green Space	<p>The Council notes the inclusion of the Marina Campsite as a Local Green Space. The Council could not identify that an assessment had been undertaken in respect of the impact of the designation, taking account of criteria b, on the ongoing operation of the site as a campsite given the extensive restrictions on development that are associated with such designations. In order to demonstrate that the designation does not conflict with objectives of planning for sustainable development, which includes enabling sustainable rural tourism, the Council would recommend such an assessment is undertaken in liaison with the operator of the site.</p> <p>The Council further notes the proposed designation of the “Green space behind Grebe Drive”. Whilst the previously available permissive footpaths were no-doubt of some value to the local community, the Council is concerned that, based on the justification provided, the site does not meet the threshold of being demonstrably special as set out in paragraph 102. In addition, the Council is concerned, as noted in the assessment that the site is of itself large and therefore could be argued to be a relatively extensive tract of land. Moreover, paragraph 101 is clear that the designation of land as Local Green Space should be consistent with local planning of sustainable development. In this regard that Council notes that, whilst not ultimately allocated, this site was identified as suitable for development through the GNLP site assessment process. Should a further need for development be identified it may be that this could be considered a candidate site and as such the LGS designation may not be capable of enduring beyond the plan period.</p>	<p>Decision made to remove Marina Campsite at a LGS designation.</p> <p>Decided to keep the back lane LGS and added to the assessment that there’s a green corridor that runs alongside it and that part of one of the key views incorporates it.</p>
Page 62 – Policy 9 Protection of Key Views	<p>It is positive to see that views into the village have been considered, not just views into open countryside.</p> <p>However, the Council would re-iterate a comment that it made on a previous draft of the Plan that several of the views would seem to illustrate the landscape and townscape character that the plan seeks to conserve, rather than capturing an important view in its own right. It is suggested that a review of the identified views would be useful, to ensure they meet robust criteria.</p>	<p>Had a conversation about each of the views and decided to keep each of them in the plan, they capture what’s special about the historical and natural environment.</p>

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Page 64 – Paragraph 121	Typo – first sentence ‘...strong employment- and tourism-related links...’	Amended typo
Page 65 – Policy 10 Employment Growth	<p>Class E covers a very broad range of different uses, including retail, indoor sport, medical services, and light industrial processes, for example. It would be more beneficial to refer to more specific uses which would be supported, rather than refer to the use class.</p> <p>Bullet point c) – ‘...proposals within the town centre taking every opportunity to provide parking on site’. The Council queries whether this is a justifiable (and sustainable) requirement, particularly as it does not take account of public car parks that already serve the town, nor pedestrian, cycle and bus links –</p>	<p>Discussed and want to include all Use Class E, so long as the activity is in the appropriate area. Added this into the supporting text.</p> <p>Amended clause C with a steering group members suggested wording.</p>
Page 66 – Policy 11 Protecting Key Employment Sites	<p>It is noted that some amendments have been made to the third paragraph, following the Council’s previous comments. However, it is felt that the wording needs revisiting. Firstly, there is a typo in the sentence, ‘...alternative uses have been explored due to employment uses are not viable...’. In addition, it is not readily apparent that the third paragraph is referring to applications for alternative uses. For continuity purposes, it would probably help for the third paragraph to follow the first.</p> <p>Criteria b) – would it be expected that such interventions (if any) that are feasible have been explored and implemented, with evidence provided to show they have not made the site more attractive? Otherwise this may be difficult to demonstrate.</p>	<p>The paragraph with a typo has been reviewed.</p> <p>Added further detail to criteria b in line with suggestion.</p>
Page 73 – Protection and Enhancement of Public Rights of Way	The second paragraph currently reads as a series of project aspirations for the enhancement of the PRoW network, rather than providing clarity on what may be required of a developer in order to address any likely implications of their scheme. If it is to remain as it is, then it should be featured within a project plan (see later comment).	<p>Does this comment relate to the policy?</p> <p>Sought to clarify the final para.</p>
Page 76 – paragraph 154	<p>Typo in sentence 4 – ‘stablished’</p> <p>Typo in sentence 5 – references policy 13 when should be policy 14</p>	Amended typos.
Page 77 – Policy 14	It is not recommended to reference specific policies in the South Norfolk Local Plan and Broads Local Plan directly as	Noted.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Community Facilities	<p>these could be superseded in the future. Also, there is no need to reference other plans in policies as they should be read in conjunction with the Neighbourhood Plan.</p> <p>The Council would recommend that the wording is changed to 'The following facilities are important to the community and should be protected from inappropriate development or changes of use'. This will ensure that the policy does not become prematurely out-of-date.</p> <p>Third paragraph – by implication, does this mean that any development or expansion to these buildings that doesn't meet any or all of these criteria would not be supported by the Neighbourhood Plan?</p> <p>As raised previously, the Council suggests that the final three paragraphs form part of a community aspirations (or similar) section (see comment below), as they deal with investment in community facilities. The fourth paragraph would seem to preclude the provision of new community facilities – is this what is intended?</p> <p>Presumably the inference is that improvements may be financed via s106 agreements, but other funding streams such as the neighbourhood element of CIL contributions and other external funding should not be discounted.</p>	<p>Amended the second para with SNC suggestion.</p> <p>Updated third paragraph.</p> <p>Decision to retain the final 3 paras.</p>
Page 79 – Paragraph 162	<p>There is a long list of community feedback points but after there is no reference as to how these have been addressed or considered. Obviously, a lot of these are not planning issues that the Neighbourhood Plan is able to address. However, for clarity, it may be appropriate to state this and that, where possible, policies will address the issues listed.</p> <p>Any remaining, aspirational items could form projects to be taken forward within the community, considered within a separate section of the Plan. See comment on implementation, monitoring and review, below.</p>	<p>Reviewed the paragraph.</p>
Page 80 – Policy 15 Walking and Cycling Improvements	<p>Very positive to see cross reference to green infrastructure and the multiple benefits these can provide.</p> <p>In the third paragraph there is generally no need to reference other policies as the plan should be read as a whole.</p> <p>However, if reference is still desired should reference also be made to Policy 13 and Public Rights of Way?</p>	<p>Whilst we understand that the plan should be read as a whole, reference to Figure 11 green corridors is to help applicants pay attention to the</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
		corridors in case this may be within or adjacent to their site when considering walking/cycling opportunities.
Page 87 – Policy 17 Loddon and Chedgrave Conservation Areas	<p>Part b) – it is important to note that Listed Building Consent may well be required to change the paint colour of a building, within the Conservation Area.</p> <p>Part c) – the Council is still unsure as to what is meant by ‘making use of the original boundary treatment in keeping with the local vernacular...’</p>	<p>Noted on part b added a footnote.</p> <p>Reworded criteria c.</p>
Implementation, monitoring and review	<p>It is felt that there is a section missing at the end of the Neighbourhood Plan, relating to how the Plan will be implemented, monitored and reviewed. This is a common feature of most Neighbourhood Plans and something that the Council advises should always be included. There is useful guidance available on this subject, developed by <a href="#">Locality</a>. The Parish Councils will no doubt wish to monitor the effectiveness of Neighbourhood Plan policies, in terms of how they are being used by the local planning authority in the determination of planning applications locally.</p> <p>In addition, Local Plans are reviewed every five years, and no doubt the Parish Councils would not want the NP to become out of date because of new evidence that has emerged in the meantime or because of new Local Plan policies superseding those in the Neighbourhood Plan.</p> <p>Therefore, in addition to monitoring how policies within the NP are used by the local planning authority, there is also a role for the Parish Councils in monitoring the relevance of individual policies and how up-to-date they are, in light of any new issues, legislation, or Local Plan reviews. This may trigger the need for a Neighbourhood Plan update.</p> <p>As an example, future planning reforms are expected through the Levelling Up and Regeneration Bill and this may well have an impact on the role of future Neighbourhood Plans.</p> <p><u>Projects / Community Aspirations</u></p> <p>It is also notable that the Neighbourhood Plan does not identify any specific community projects or aspirations to be followed up as part of a community action plan.</p>	Added a monitoring section.



Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>This is considered a tremendously useful element of neighbourhood planning, in that it allows for particular community aspirations (that cannot be addressed through the planning system) to be captured within a separate section of the document and listed as part of a project plan that can be progressed by the community. This can also be useful as a local priority list through which to direct neighbourhood CIL monies and other external funding.</p> <p>Despite projects not having been identified within the document, there are definite allusions to potential activities – community energy generation (para. 46); promoting and enhancing walking and other recreation opportunities (paras. 135-137); better promotion of community activities (para. 142); improvement to specific community facilities (paras. 144-152); access improvements (para. 162). These initiatives, and any others identified during public consultation could usefully form a project plan that supports the vision of the Neighbourhood Plan.</p> <p>If it would help, the Council could provide some guidance in terms of helping to identify specific, potential projects and the range of different funding opportunities that may be available.</p>	
Housing Need Assessment	<p>The HNA assumes that Loddon and Chedgrave is a closed housing market. As a 'market town' it meets housing need from other parishes which are not in a position to deliver (any or enough) affordable housing.</p> <p>Para. 121 – The Council challenges the assumption that all future affordable housing should offer a route to ownership. This is not justified by the evidence.</p> <p>Para. 175 claims there is enough 1 bedroom accommodation. This ignores para. 103, which provides evidence of unmet need for 1 bedroom social rented housing. This non-sectoral analysis leads the Council to challenge the 'no need for 1 bedroom homes' conclusion. See the caveat in para 108 and the comment in para 190.</p>	<p>Note the comments. However, AECOM has finalised the report now and won't be making anymore amendments. Considered the points where appropriate in the NP text.</p>
Design Guide & Codes	<p>Page 12 – the map doesn't show the Registered Park and Garden properly. It is shown correctly on Figure 18 of the Neighbourhood Plan, however.</p> <p>Page 41 (and page 7) – Active travel. It may be useful to show the route of Sustrans route 1 which runs through the area (acknowledging this is shown in Figure 17 of the Neighbourhood Plan). In addition, there is also a potential local connection (via Heckingham) to Route 31 and the</p>	<p>We cannot amend the AECOM Design Codes document. Taken the points into consideration</p>



Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Reedham ferry. The route to Heckingham could usefully be promoted for recreational cycling, as this is a little used car route.</p> <p>Page 45 – the Council would only generally advise on rear parking courts if they are partially fronted in relation to the property and safe/secure.</p> <p>In addition, rather than stating ‘minimise impervious surfaces’, the Council suggests ‘avoid impervious surfaces’.</p> <p>Page 46 – the diagram is not consistent with Norfolk County Council parking standards.</p> <p>Page 49 – this section should acknowledge Secure by Design and not show routes which are not well overlooked and which do not feel safe. Too much permeability can create Secure by Design issues.</p> <p>Page 77 – It is felt that the diagram should show more frontage street planting / lawn in front of the industrial units. Ideally there would be a green buffer. This would be considered more important than, for example, allowing parking to the front of units if the building is set back and planting is provided to the front. The NPPF street tree planting requirements apply to all development, not just housing.</p> <p>Page 82 – Street grid and layout. It is felt there should be a reference to Safe Streets here, in terms of surveillance (and perhaps Healthy Streets?). Routes should provide visual interest for pedestrians.</p>	where needed within the NDP text.
Local Green Space Assessment	<p>Page 16 – Green spaces within the Gunton Rd and Cannell Rd Estate. South Norfolk Council owns the the Gunton Road green space (currently described as being owned by a private company).</p> <p>Page 18 – Leman Grove. South Norfolk Council does not own the southern open space at Leman Grove. It is owned by Saffron Housing Trust.</p>	Amended the LGS.

### Waveney, Lower Yare and Lothingland Drainage Board (Water Management Alliance)

Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
Loddon and Chedgrave fall partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board’s Byelaws apply to any development within the Board’s area. This includes with respect to the allocates sites in the GNLP.	Note the comments and information shared.

Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>It is noted that two sites have been allocated for housing developments within the Greater Norwich Local Plan (GNLP0312 – at least 180 dwellings in Loddon, and GNLP0463R – at least 60 dwellings in Chedgrave). Whilst these have not been allocated within your own neighbourhood plan, in order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes, please be aware of the following where developments are proposed within or partially within the Board's IDD. Byelaw 3, 10, 17 and S.23 of the Land Drainage Act 1992 and Byelaw 4.</p> <p>For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:</p> <ul style="list-style-type: none"> <li>• If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.</li> <li>• If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the <a href="#">Non-Statutory technical standards for sustainable drainage systems</a> (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.</li> </ul>	

## Local / Non-Statutory Stakeholders

### Loddon Town Council

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>The Council wished me to pass on their thanks to the Steering Group and PC for the immense amount of work that has gone into delivering an excellent Neighbourhood Plan.</p> <ul style="list-style-type: none"> <li>• P.42 – bottom right image – ‘the Old Hockey Field’</li> <li>• P.44 – map should read – ‘Loddon and Chedgrave Playing Field’</li> <li>• p.52 – 3. ‘Loddon and Chedgrave Playing Field’ <ul style="list-style-type: none"> <li>○ 8. ‘The Old Hockey Field’</li> </ul> </li> <li>• p.75 – 152 – The Staithe Car Park is in <b>Loddon</b>, not Chedgrave</li> <li>• p.77 – Public Toilet and shower block at the Staithe Car Park, <del>Chedgrave</del> – Loddon</li> <li>• p.30 – Loddon Conservation Area – typo – ‘bbuildings’</li> <li>• p.68 – Loddon’s shopping strip?</li> <li>• p.74 – 141. Community facilities - Loddon’s Council offices is not on the list</li> <li>• p.75 – 146. <del>The Library</del> - The Old School house is grade II listed and currently houses the Community Gym, Council Office and Library. It is currently owned by Norfolk County although long term it would ideal if this building was owned by the community.</li> <li>• p.75 – 145 – maybe mention that the car park is not large enough to accommodate the hall users and sports club users? There is one garage, one container used by the Jubilee Hall and one container used by the LUFC Juniors.</li> <li>• p.78 – 160. - accessing Loddon by bike is very difficult as there are no crossing points over the A146.</li> <li>• p.82 – 169. – Just a comment, but I had heard that the land adjacent to the Chet Valley Medical Practice would be used for the new fire station if it ever comes to fruition.</li> </ul> <p>Also, I know that the idea of a Loddon museum, display of historical archives and Chet medieval boat has been mentioned, with the possibility of using the Hollies for this purpose.</p>	<p>Welcome the comments.</p> <p>Thanks for the feedback and update.</p> <p>The plan has been amended taking on board specific comments.</p> <p>LGS maps updated with correct titles</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Healthcare-	<p><u>Healthcare: the proposed development and its impact on medical and dental care provision.</u></p> <p>An increase in population within the catchment area of local GP and Dental surgeries will undoubtedly add significantly to already overstretched services. The draft document highlights concerns re this (<i>Access to services</i> para.166) however proposes only to support “...in principle, subject to compliance with other relevant policies...”.</p> <p>We do not believe that this will serve to ameliorate the subsequent problems these services will face due to an increase in the current local population without an assurance of financial investment from developers.</p>	<p>The concerns are noted and shared, however the NP is not allocating further sites for development and is not able to determine delivery of strategic healthcare services as this is for higher level plans.</p>
Education	<p><u>Education: the proposed development and its impact on education.</u> As above, in <i>Access to services</i> para. 165, 166 concerns re pressures on schools has been raised. This affects all levels of education, from early years through to sixth form and any increase in population will impact on provision of education, with increase in class size and potentially shrinking of catchment area.</p> <p>As a neighbouring community this is of particular concern given the number of families with young children currently residing in Claxton.</p>	<p>As above, this is a strategic planning matter rather than one for the NP.</p>
Traffic	<p><u>Traffic: the impact of any further development on volume of traffic passing through Claxton.</u> Claxton is a linear village, the vast majority of households being on The Street, C202 , a minor road with a 30mph speed limit imposed. In recent years traffic has increased due to new development in surrounding villages, an increase in daily school run traffic (including minibuses) and the increase in disruption of traffic flow on the A146 caused by repeated roadworks and road traffic collisions.</p> <p>Additional new development will add to these problems, in particular the proposed development of land in Chedgrave. Transport is already identified as the greatest carbon emitter ( <i>Low carbon technologies</i> para 36)</p>	<p>The concerns are noted and improvements for sustainable travel are promoted as part of the plan.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>and <i>Transport Infrastructure</i>, para 156 describes Loddon and Chedgrave resident's concerns re current traffic volumes.</p> <p>We echo these concerns and would urge that there is a commitment to ensuring that an adequate sustainable transport infrastructure is in place prior to commencement of any development.</p>	

### The Trustees of the Loddon Buildings Preservation Trust

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General comments	Comments are geared to making the plan support our efforts as we move forward to gain funding. South Norfolk told us that it is important to have the phrase "investment priority" relating to the Hollies in the plan. I think it is also important to point out that the high quality facilities that local people want are currently not available.	Noted and reflected in the supporting text.
Policy 13- Protection and enhancement of PRoW	<ul style="list-style-type: none"> <li>Ensuring there is adequate infrastructure to meet community needs</li> <li>Para 142 list including the Hollies</li> <li>Para 147 – mention of Policy 13 - It is not clear what policy 13 has to do with regeneration of buildings, it seems to be about rights of way?</li> </ul>	<p>The list does include The Hollies.</p> <p>The previous Para 147 should have mentioned policy 14 not 13. Updated.</p>
Policy 14- Community Facilities	<ul style="list-style-type: none"> <li>Add further detail to the last Para such as below:</li> </ul> <p>Proposals that would result in sensitive regeneration of the Hollies building and the Methodist Hall for community use are an investment priority for Loddon and Chedgrave and will be supported subject to compliance with other relevant policies. The area does not currently have a high-quality community hall and local residents travel outside the area to hire attractive community spaces with high standard facilities.</p>	Included the suggested text within the supporting text for the policy.

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
Introduction	This response is made in respect of the Land to North of Beccles Road (GNLP4028) whereby the client is promoting for a mixed use residential led development including 90 dwellings. Acknowledge the hard work and effort put into the NP and are in general support of the draft plan. However, suggest a few amendments to some elements of the plan for greater clarity.	Welcome the general support.
Background policy context	Detailing the area, the requirements of a NP and the local development plan including the delay of the emerging GNLP because of the housing delivery issues related to nutrient neutrality.	Noted on the background context. We are aware of this information.
Pre-Submission draft NP	<ul style="list-style-type: none"> <li>• Welcomes the NP objectives</li> <li>• The NP is not clear about the relevant plan period. It is considered the plan should align with the emerging GNLP 2038.</li> <li>• Para 24 it is noted the list of household survey main issues is incomplete.</li> <li>• Policy 1 is supported</li> <li>• Policy 2 is supported. However, it might be helpful to reference NCC latest standards for EV charging set out in the parking guidelines July 2022.</li> <li>• Policy 3 is supported.</li> <li>• Para 60- recommend acknowledging that planning applications have been submitted for both GNLP sites and that outline has been granted in respect of GNLP0463R for 76 dwellings.</li> <li>• Policy 4- support the proposed tenure split and local eligibility criteria. However, it would be helpful with the criteria if the qualifying requirements were covered in more detail in the supporting text such as how long does somebody have to be working locally to qualify and is the relevant area the NP area.</li> <li>• Policy 5- The principle of securing a local housing mix need is supported. However, recommend that references to the HNA 2022</li> </ul>	<p>Note the comments and welcome the support.</p> <p>Provided clarity on the plan period on the front page (2021-2038).</p> <p>Updated the list of issues.</p> <p>Referenced the most up to date NCC standards In Policy 2.</p> <p>Updated Para 60 with latest information.</p> <p>Useful comment on Policy 4 –added in more detail to the supporting text at Para 66 and said a reasonable amount of time to be set is 3 years for one to be considering a medium to long-standing commitment to the area.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>should be caveated with “or any more up to date local housing needs evidence” for clarity.</p> <ul style="list-style-type: none"> <li>• Having a housing mix of at least 70% of homes having two or three bedrooms seems overly complicated and prescriptive. The mix needs to reflect local need for market/affordable housing at the time and should be allowed to reflect market housing demand, since many windfall sites there will not be an affordable element, which may be for slightly larger properties to support the growing trend for home working. There should also be allowance for site context/characteristics to be considered such as the correct design approach of a large property going on an infill plot surrounded by larger properties.</li> <li>• Policy 6 is supported.</li> <li>• Policy 7 is supported. However, regarding criteria d if biodiversity is to be delivered off site it should also be preferable to deliver this within reasonable proximity to the development site itself as well as in or adjacent to the extent of the blue and green corridors.</li> <li>• Policy 8 is supported.</li> <li>• Policy 9 – principle is supported. However the location and extent of views L1,L7,L8,C1,C4 should be reviewed. <ul style="list-style-type: none"> <li>a) For View L1- Recommend the view is narrowed slightly and the southern extent should follow a more due east alignment since the value seems to be more strongly related to the Chet Valley and Pyes Mill.</li> <li>b) View L7- The view takes in the rear properties in Foxes Loke and Low Bungay Road. Its value is probably greater further along the public footpath to the south.</li> <li>c) View L8- This view in Sandy Lane is shown as on the south side of the pylons which cross the lane and would dominate the foreground in this part of the lane. It is also shown on Figure 14 to capture the allocated</li> </ul> </li> </ul>	<p>Policy 5- agree added wording.</p> <p>Note the comments made for Policy 5- however the NP aims to ensure that future housing meets local need, and the requirements reflect the Loddon and Chedgrave HNA 2022 which recommends at least 70% of homes being of a smaller size. This does not mean necessarily that larger properties will not be considered depending on the circumstance and need at the time.</p> <p>Policy 7- Reviewed and amended criteria D.</p> <p>Regarding views, L1. That seems reasonable. L7. The point is that there is a view from the road bridge over the beck. More people could enjoy it here than might walk along the path. This helps protect the adjacent open space. there are not such views further along the footpath. L8. That seems reasonable. Have updated the photo.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>housing site GNLP0312 to the west. The view is more expansive approximately 400m further up Sandy Lane where the skyline, as described in the view assessment, can be better appreciated. The accompanying photograph in the assessment also appears to have been taken in this location to the north of the pylons. Figure 14 should be amended to relocate the view further north along Sandy Lane and to realign it away from the west to encompass more of its open countryside value to the north (a more detailed assessment is provided by a landscape consultant in the written representation.)</p> <p>d) View C1- This is shown as an expansive view. However, the photo appears to follow the southern alignment of the view only.</p> <p>e) View C4-The views assessment refers to this as a moving viewpoint and should be amended. The viewpoint should be amended to focus on the road and verges more accurately.</p> <ul style="list-style-type: none"> <li>It is suggested that Figure 15 is updated to reflect the recently consented additional employment site which is the north side of Beccles Road (App 2022/0016) which was granted PP July 2022 for commercial development of 1.16ha. Subject to updating Fig 15 Policy 10 and 11 are supported.</li> <li>Recommend reviewing Para 130 to change reference of Use Class A1 to Use Class E.</li> <li>Policy 12, 13, 14, 15 and 17 are supported.</li> <li>Policy 16 is supported. However, question if this is more of a community aspiration.</li> <li>Policies map – recommend updating this to include the emerging residential allocations which one now has outline planning permission. Also include the employment site</li> </ul>	<p>C1. That seems reasonable. Have updated the photo.</p> <p>C4. This is to protect the line of beech trees, field boundary (behind part of which the new development will take place) and the path. The road is slightly curved (hence the need for 'a moving viewpoint'.</p> <p>Amended Figure 15 to include the site referred to.</p> <p>Updated Para 132 from Use Class A1 to Use Class E.</p> <p>Have not added LP residential allocations to the policies map as these are not allocated in the NP plan.</p> <p>Updated the policies map</p>



Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>granted permission on the north side of Beccles Road.</p> <ul style="list-style-type: none"> <li>• Policies map- colour used for the Historic Park and Gardens and the key employment locations are very similar recommend changing to avoid confusion. The extent of the Historic Park and Gardens also differs from that shown in Fig 6 of the Design Codes document.</li> </ul>	
Appendix A- Feedback from Landscape Consultant for View L8	<ul style="list-style-type: none"> <li>• Professional opinion L8 is too wide a viewpoint with differing characteristic views.</li> <li>• Single photograph located part way along Sandy Lane looking north along the road. The site lies to the west out of the view of the viewpoint photograph.</li> <li>• There is no public footway, even though it is described as being publicly accessible, and the lane is described as being an important route for walkers and is relatively traffic light and so safe. However, no evidence in the assessment to support this.</li> <li>• The views to the west of Sandy Lane display a different character to the north. It is our opinion from site observations that the views to the north of Sandy Lane are more rural/unspoilt than the views to the west which are heavily influenced by urbanising features and less expansive.</li> <li>• Views to the west are considered to be of a lower scenic value than the north and should not be included in the panorama of viewpoint L8.</li> </ul>	<p>Added more photographs to the views assessment.</p> <p>Changed the photos regarding west of Sandy Lane to new ones that a steering group member has sent using their 50mm lens camera setting.</p> <p>Added detail from this representation into the assessment for L8.</p>



## AR Planning on behalf of Redbourne Homes

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
Background	<p>Redbourne Homes are part of the family owned Breheny Group civil engineering company. They are the owners of land to the east of High Bungay Road, Loddon that was previously promoted for residential development by Allison Homes (previously called Larkfleet Homes) under an option agreement.</p> <p>Allison Homes no longer has an interest in the site but our client remains interested in promoting their land for residential development. In addition to providing comments on the draft NDP we would therefore like to take this opportunity to set out the suitability of our client's site for residential development and put forward our client's initial proposals for how the site could be sustainably developed.</p>	Note the context. However, at this stage the NP is not looking to allocate any sites.
Representation on housing	Our client's representations below have due regard to the legal and policy requirements for neighbourhood planning and focus on whether the draft NDP accords with national and local policy and whether it would contribute to the achievement of sustainable development.	Note the comments on housing need. The NP is not allocating any sites at this time, whilst we respect the comments made on the unmet need

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	<p><b>Housing need</b></p> <ul style="list-style-type: none"> <li>• Support the second objective of the NDP but concerned at how this objective is translated into policies for the provision of housing.</li> <li>• The NP does not allocate any sites, Para 60 of the NP is correct in so far as the basic conditions require general conformity with strategic policies contained in the development plan. However, basic conditions also require NPS to contribute to achieving sustainable development which by definition includes the provision of a sufficient number and range of homes to meet the needs of the present and future generations.</li> <li>• The draft NP HNA sets out important evidence on the scale of affordable housing need (183 dwellings). It shows there is an unmet need for affordable homes, the HNA assesses the number of affordable dwellings expected to be delivered from the 240 new homes allocated in the emerging GNLP showing it would deliver just 79 out of a need of 183 affordable dwellings.</li> <li>• Whilst there may be no pressure to allocate sites to meet a specific requirement set by the GNLP, there is a clear need to plan for more housing to meet the forecast unmet need for 104 additional affordable dwellings over the plan period. In reality the only way to deliver this number of affordable dwellings will be to allocate additional market housing that will deliver a proportion of affordable housing.</li> <li>• Despite the HNA's clear evidence of unmet need, the draft NDP is silent on the actual number of affordable homes needed. It simply states at paragraph 71 that there is "a potentially very high demand for affordable home ownership products". In recognising this need but not choosing to plan positively to meet it, we consider that the draft NDP does</li> </ul>	<p>of affordable housing in the parish.</p> <p>We believe we have met the basic conditions through the introduction of numerous policies which will contribute to sustainable development within the parish through future applications. This includes how the housing policies will contribute to the affordable housing need for the parish if development of such a scale comes forward.</p> <p>Have reflected back on the affordable housing section in the HNA 2022 and amended the paragraph to address the issue of affordable housing need.</p> <p>The District Council has not specifically objected to the set tenure mix of 70:30 in their representation. However, asked for more flexibility in the wording of the policy. It is not the NPs intention to undermine affordable housing numbers in allocations/applications moving forward but to set criteria in line with</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>not meet the basic condition to contribute to achieving sustainable development.</p> <p><b>Affordable Housing</b></p> <ul style="list-style-type: none"> <li>• Policy 4- Based on the evidence contained in the HNA we consider that there is some justification for increasing the proportion of affordable home ownership products to meet needs, but this shouldn't be at the expense of meeting the quantified need for affordable rental accommodation which serves those in the most critical housing need.</li> <li>• If a 70:30 tenure split was set in favour of affordable ownership products, the 79 affordable homes deliverable through the GNLP allocations would provide just 24 affordable rent dwellings. This is 10 short of the 34 households currently on the Council's housing register. We very much doubt that the District Council would support such an approach especially given the critical need and shortfall in the delivery of affordable rented housing across the Greater Norwich area. The 240 dwellings allocated in the GNLP are ostensibly intended to meet the NA's share of Greater Norwich's housing needs and by setting such a low requirement for affordable rented housing there is a strong argument that the draft NDP would not be contributing to wider sustainability goals.</li> <li>• Whilst we commend the draft NDP for seeking to ensure affordable housing delivery is targeted to meet local needs, it is clear that amending the tenure split of affordable housing to be delivered by the GNLP allocations will not be sufficient to meet the NA's needs. This again highlights the need to plan for additional market housing to ensure the delivery of a sufficient proportion of affordable housing to meet identified needs.</li> </ul>	<p>suggestions for the NP HNA.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
Representation on the environment	<p><b>Policy 7: Biodiversity and Blue/Green Corridors</b></p> <ul style="list-style-type: none"> <li>Our client is pleased to support Policy 7 which identifies several blue and green corridors along which the draft NDP seeks to deliver net gains in biodiversity. Our client's land to the east of High Bungay Road, Loddon includes part of one of the proposed green corridors that runs along the Loddon Beck on the eastern boundary of our client's land. We have marked on the plan below the approximate extent of our client's landholdings in blue. This shows that in addition to the land promoted for residential development, our client owns additional land to the north and east along the Loddon Beck.</li> <li>We can confirm that our client is committed to delivering biodiversity net gain on site and along the green corridor as part of their development proposals. There is a real opportunity for the proposed development to improve the function and habitat connectivity along Loddon Beck green corridor which we consider should be supported in line with this policy.</li> </ul> <p><b>Policy 9: Protection of Key Views</b></p> <ul style="list-style-type: none"> <li>Our client does not object to a policy identifying key views but considers that the views identified should be subject to rigorous assessment. In this respect we are concerned that the Key Viewpoints Assessment 2022 does not appear to have been undertaken by a qualified landscape professional. The assessment includes just one photograph of each view and there is no identification of the type of camera used and whether any photographs are zoomed in. We would normally expect such an assessment to be undertaken using a 35mm equivalent digital</li> </ul>	<p>Note the comments/map informing us of the land which falls along the green/blue corridors.</p> <p>Regarding the views assessment- it is not a requirement for this to be undertaken by a qualified landscape professional.</p> <p>Photos have been retaken for some of the views. L7 has been reviewed, taking into account the feedback given to make this clearer. Edited the assessment.</p> <p>SNC recommended including the word 'adversely' when they reviewed the draft prior to Regulation 14, decision to leave this in.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>SLR camera at a 50mm focal length in line with LI technical Note 06/19. This guidance ensures that the photographs presented fairly represent what people would perceive with the naked eye.</p> <ul style="list-style-type: none"> <li>• Our client's primary concern with Policy 9 is the identification of Viewpoint L7 as a key view. This view is taken along Loddon Beck from the bridge on Beccles Road looking south by south-west. It is unclear from the photograph presented whether our client's land is visible in this view, but based on the plan provided we assume that it would be partially visible in the distance. In this respect, we are concerned that the Key Viewpoints Assessment 2022 describes the view as a long view as it would appear that the most important aspects for the character of this view are actually the open fields in the foreground. There is also residential development visible along the western edge of this view but at no point is this recognised in the assessment. It is also clear from the assessment that the protection of this view is as much to do with a desire to preserve the character of the walk along the eastern bank of the Loddon Beck which very quickly turns to the south-east. As such views along the Loddon Beck are primarily to the south and south-east in which our clients land would very much be on the periphery.</li> <li>• We do not object to the identification of Viewpoint L7, but we consider that the assessment requires refining to ensure that it highlights the important character of the view without preventing or discouraging appropriate growth at the edges of the view.</li> <li>• Recommend amending the wording of Policy 9 to:</li> </ul> <p>““Development proposals that would <del>adversely</del> affect these key views will <b>be expected to be sympathetic</b></p>	

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>to local character and history including the surrounding built environment and landscape setting <del>not be supported</del>".</p>	
<p>Land to the East of High Bungay Road, Loddon</p>	<p>On behalf of our client, we have reviewed the previous planning applications prepared by Allison Homes, the technical evidence submitted in support of the applications and the comments made to the applications, including by Loddon Parish Council. We are aware of the concerns raised previously and our client has instructed a team of consultants to review these matters and advise on the development potential of the site.</p> <p>On reviewing this advice, we are confident that the site is suitable for residential development and that a sensitively designed scheme could deliver real benefits to the area. We set out below our client's initial proposals for the site, including how they have been designed to respond to previous concerns. The proposed development site comprises 4.4ha and includes a larger area than that previously promoted by Allison Homes to include land stretching down towards the Loddon Beck in the east for the delivery of Biodiversity Net Gain. In summary the proposals comprise:</p> <ul style="list-style-type: none"> <li>• <b>Scale:</b> Approximately 42 dwellings on a developable area of 1.3ha (i.e. just 30% of the site area) providing a medium density scheme in character with the local area. The scheme would as a minimum deliver policy compliant affordable housing in accordance with emerging Policy 4, but we would welcome the opportunity to discuss with the Neighbourhood Plan how the site may be able to deliver additional dwellings for affordable home ownership to meet local needs.</li> <li>• <b>Appearance:</b> A variety of building sizes, form and massing reflecting dwelling types found in</li> </ul>	<p>We understand that this part of the representation sets out detail promoting the site for the Land to the East of High Bungay Road, Loddon.</p> <p>Whilst we respect the time taken to include this in the NP Reg.14 representation. The NP is not allocating a site for development at this stage.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Loddon. Our client is committed to delivering a development that is informed by a detailed assessment of the character of the local area.</p> <ul style="list-style-type: none"> <li>• <b>Layout:</b> Our client's initial proposals (<b>see enclosed</b>) have been designed to work with the contours of the site and deliver areas of open space and landscaping that would help integrate the proposals into the surrounding area, retain the existing pillbox on the site and preserve the amenity of adjoining dwellings.</li> <li>• <b>Access:</b> Vehicular and pedestrian access is proposed from High Bungay Road to the west of the site in a similar way to the previous applications. There was no objection from Norfolk County Council, as Local Highway Authority (LHA), to the previous applications and this access is therefore considered appropriate to serve the proposal. The LHA did, however, object to the provision of a separate pedestrian access from the north-west corner of the development on onto High Bungay Road on grounds that it was unnecessary and potentially hazardous. Accordingly this access has been removed from the proposal. We appreciate that Loddon Parish Council raised concerns to the previous proposals on highways grounds and our client is committed to undertaking a detailed transport assessment to ensure that the proposed access remains appropriate and to identify any potential improvements required to local highways infrastructure.</li> <li>• <b>Drainage:</b> We understand that detailed comments were received to the previous applications regarding flood risk and in particular areas at risk of surface water flooding on the site. Our client has instructed Ingent Consulting Engineers to advise on drainage</li> </ul>	



Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>matters. Ingent has assessed the most recent flood risk data to produce a constraints plan (<b>see enclosed</b>) for the site identifying those areas at risk of flooding that should be retained as open land. These areas are incorporated into the layout as public open space. The proposed drainage strategy incorporates sustainable drainage in the form of swales and a drainage basin. Prior to finalising the drainage strategy, infiltration testing will be undertaken to assess whether surface water can be drained to the ground or whether a restricted outfall is required to the local watercourse.</p> <ul style="list-style-type: none"> <li>• <b>Landscaping and Ecology:</b> As set out above, the layout of the proposed development has been designed to deliver areas of open space and landscaping that would help integrate the proposals into the surrounding area, retain areas at risk of surface water flooding as open land, deliver an integrated sustainable drainage system, retain the existing pillbox on the site and preserve the amenity of adjoining dwellings. In addition, the proposal has been designed to deliver Biodiversity Net Gain through the delivery of a large area of land along the Loddon Beck green corridor that would be enhanced and managed for wildlife. The total area of open space proposed is 3.1ha (i.e. 70% of the site area) which is proposed to be split into c.1.9ha of recreational open space and landscaping and a c.1.2ha wildlife zone to deliver on-site Biodiversity Net Gain. The wildlife zone would help to deliver the aims of the proposed green corridor identified at Policy 7.</li> </ul>	
Summary and conclusion	<ul style="list-style-type: none"> <li>• The HNA prepared for the draft NDP identifies a significant need for affordable home ownership dwellings in the NA that won't be</li> </ul>	Thank you for your conclusion. Comments

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>met by the proposed GNLP allocations. The size of the unmet need identified is significant at 104 dwellings and in reality, the only way to meet this need will be to allocate additional market housing sites to deliver a sufficient proportion of affordable housing. The draft NDP recognises this need but fails to plan for it. In this context we consider that the draft NDP does not meet the basic condition to contribute to achieving sustainable development as it would not deliver a sufficient number and range of homes to meet the needs of present and future generations.</p> <ul style="list-style-type: none"> <li>• The draft NDP seeks to address the need for affordable home ownership dwellings by amending the tenure split required for affordable housing delivered by the GNLP allocations. We commend the draft NDP for seeking to ensure affordable housing delivery is targeted to meet local needs, but this policy is clearly not without its issues as it would result in the delivery of fewer affordable rent dwellings that would not meet local needs or help to meet district needs. It is also clear that the number of affordable homes to be delivered by the GNLP allocations will not be sufficient to meet the NA's needs. The only way for these needs to be met would be through the allocation of additional housing land that would deliver a proportion of affordable housing.</li> <li>• We consider that there is a clear need for the draft NDP to allocate additional housing sites. In this context, we have set out our client's initial proposals for their site that would deliver approximately 42 high-quality homes, well designed areas of open space and significant space for wildlife to deliver Biodiversity Net Gain. There is a real opportunity for the</li> </ul>	<p>considered and addressed above.</p>

Section	Summary Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>proposed development to improve the function of and habitat connectivity along Loddon Beck green corridor and we would welcome the opportunity to discuss with the Neighbourhood Plan group how the site may also be able to deliver additional dwellings for affordable home ownership to meet local needs.</p>	



## Summary Feedback from Landowners of Local Green Spaces

LGS	Summary of comments	NDP response
1. The bowls green, Loddon	No specific response.	No comment.
2. Loddon allotments, Bridge Street, Chedgrave	No specific response.	No comment.
3. Loddon and Chedgrave Sports Field	No specific response.	No comment.
4. Small green areas in the 20 <sup>th</sup> and 21 <sup>st</sup> century estates, Loddon	No specific response.	No comment.
5. Open space at the corner of Garden Court, Loddon	No specific response.	No comment.
6. Green spaces with the Gunton Road and Cannell Road estate, Loddon	No specific response.	No comment.

LGS	Summary of comments	NDP response
7. Leman Grove greenspace, Loddon	No specific response.	No comment.
8. The Hockey field, Loddon	No specific response.	No comment.
9. Marina Campsite, Loddon	Object to this space being designated as felt that it is private property and contains brownfield commercial development. The response suggests that permissive footpath access will be withdrawn if the space is designated as LGS.	Decision to remove LGS designation from the NP.
10. The Pits, Chedgrave	No specific response.	No comment.
11. Land behind Grebe Drive, Chedgrave	Objected to this site being taken forward as an LGS for reasons such as the lack of evidence to meet NPPF Para 102b, it's privately owned arable land, the site may have had some recreational value for the community in the past this cannot be assured in perpetuity. The site is currently used for agricultural use and is being promoted in the emerging GNLP for residential use.	Following informal comments our response was that the landowner has a valid point re recreational access – but the LGS assessment makes the point that it is demonstrably special for other reasons too, beauty, wildlife, and views.
12. Chedgrave allotments, Hardley Road, Chedgrave	Landowners objected to including land at the allotments, Hardley Road on the grounds that it is currently let under license to Chedgrave Parish Council for a greatly reduced rent and for the benefit of the local community.  However, stated likely to be promoted for residential development in the medium to longer term and therefore cannot be considered available for community use(s) in perpetuity.	Previously our comments were as the land could be promoted for residential development in the medium-long term, there is potential for this site to be unavailable for allotments, which provides good justification for its protection through designation.
13. White Horse Plain, Chedgrave	No specific response.	No comment.
14. Millennium Garden, Chedgrave	No specific response.	No comment.

LGS	Summary of comments	NDP response
15. Green space at the centre of Church Close, Chedgrave	No specific response.	No comment.
16. Bowls green, Chedgrave	No specific response.	No comment.
17. Chedgrave Hills Woods	<p>Landowners objected to including Chedgrave Hills Woods on the grounds that it is a privately owned woodland and already let under licence to the Chedgrave Hills Community Association, a group of local residents whose properties back onto this land. The site therefore already comprises a 'gift' by the landowner to the local community and it is not clear why a LGS designation is required to 'formalise' this arrangement.</p> <p>Also made a point that the site represents a potentially deliverable housing allocation in the medium to long term.</p>	Previously our comments were as the land could be promoted for residential development in the medium-long term, which provides good justification for its protection through designation.
Other comments	Landowners objected to including Chedgrave Carr including reasons that the site, along with 100% of the purchase funds, has recently been transferred to Chedgrave Carr Charitable Incorporation for the benefit of the wider community. The landowners feel the site is a considerable distance from the community.	A representation was given on behalf of the landowners for Chedgrave Carr. However, this LGS was not taken forward in the Regulation 14 version consulted on. This is because the parish council previously asked the Broads Authority to allocate this as an LGS in the emerging Broads Local Plan and decided to take this out when asked by the Broads Authority in an earlier draft on our position on this.

## Feedback from Residents

The majority of residents provided their feedback via the online survey, though some did email the project officer or Town Council. Below is a summary of the comments.

### Net-Zero Policies

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>The majority of respondents strongly agreed or agreed with each of the policies.</li> <li>Viability should not be an excuse for not designing development with green credentials.</li> <li>Space within developments is essential.</li> </ul> <p><b>Policy 1</b></p> <ul style="list-style-type: none"> <li>Policy 1 seems vague regarding developers demonstrating in a statement how they will meet the policy- it may be better to require quantifiable and measurable demonstration and should state this against national/local policy specifications.</li> <li>All new houses should definitely be built with integral solar panels (Policy 1)</li> <li>Policy 1 Agree with the re-use and recycling of resources such as bricks and tiles.</li> <li>Paving/decking and definitely plastic grass should be severely limited.</li> <li>Policy 1- strongly disagree with the inclusion of the paragraph around self-build proposals. This should be removed since supporting in principle a type of residential development is at odds with the rest of the plan. Having a statement in the policy will weaken any defence against small development on a site that may not be the most appropriate for it.</li> <li>It would be a positive to actively encourage laying brick weave on sand rather than concrete to reduce run off.</li> <li>Swift boxes and hedgehog corridors should be statutory requirements.</li> <li>No gas boilers, wood burners should be permitted in new build. All should have air / ground source heat pumps and more than just a cosmetic number of solar panels.</li> <li>Is there scope for a Neighbourhood-based buying scheme for solar panels? And/or air source heat pumps?</li> </ul>	<p>Welcome the constructive feedback.</p> <p>It is now required by Building Regulations (2010) (amended) Part S<sup>2</sup> for new residential development to incorporate electric vehicle charging points.</p> <p>Whilst there may be concerns about electric cars or other future technologies, the NP aims to support one of the more climate friendly options coming forward regarding the car.</p> <p>Policy 3- Impermeable surfaces are mentioned and states these should be avoided within private gardens and driveways.</p> <p>The mapping used is from the Environment Agency.</p>

<sup>2</sup> [The Building Regulations 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

Summary of Comments	NDP Response
<p><b>Policy 2-</b></p> <ul style="list-style-type: none"> <li>• Where is 'renewable' infrastructure to support EV charging points in all the new builds.</li> <li>• Electric charging points for houses should only be fitted if the local grid can suitably handle the extra demand. Regarding public facilities, there are now 6 in Loddon which are usually empty, so it is felt this is enough to cope with expansion.</li> <li>• Concern that electric cars are proven to be detrimental to road surface due to their weight, lithium batteries are not eco friendly.</li> <li>• Concern that electric cars will put pressure on manufacturers without consideration for recycling batteries. Other technology may prevail.</li> </ul> <p><b>Policy 3</b></p> <ul style="list-style-type: none"> <li>• Will existing drainage infrastructure be improved? Where is water storage investment?</li> <li>• Needs to be made clear that astroturf should not be allowed (impermeable surface) and it doesn't biodegrade.</li> <li>• Building on flood plains or in known flood areas should not be allowed as well as the removal of trees.</li> <li>• Since the area is of high flood risk this should definitely be a priority.</li> <li>• The surface water section doesn't acknowledge the flooding of Christmas Eve 2020 in the mapping. Homes may have not been flooded but it was very close and seems a reasonable assumption that with the right conditions a full flooding event could easily occur.</li> <li>• No acknowledgement of the sewage management for the area which is already under considerable strain. While it may not be the remit of a Neighbourhood Plan, the historical approach of Anglian Water (to agree that all new development can be coped with) needs to be addressed somewhere.</li> <li>• Any new dwellings in Chedgrave need to have improvement of drainage along Langley Road to prevent water runoff from hard surfaces creating further problems with heavy rainfall. Similarly new build offering run off on George Lane and other areas in Loddon.</li> </ul>	

Summary of Comments	NDP Response

## Housing & Design Policies

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>The majority of respondents strongly agreed or agreed with Policy 4 to 6. However, a couple disagreed.</li> </ul> <p><b>Policy 4</b></p> <ul style="list-style-type: none"> <li>The provision of social housing is essential to help those born in the area remain if they wish too. More social housing should be available and not stigmatised.</li> <li>Strongly agree, but who is going to police it? What is 'local'? What if someone moved from Hales to Loddon, would that be allowed?</li> <li>No such thing as affordable housing- it needs to be made clear that a cheap price for locals will not happen.</li> <li>A covenant could be applied to Policy 4- affordable homes to ensure they are not extended and remain affordable.</li> </ul> <p><b>Policy 5</b></p> <ul style="list-style-type: none"> <li>Housing mix should include pre-fab type module dwellings as starter home for young people that will move on in a limited time (say 5 years) to free the dwelling for the next person. These could be buy to let or housing association.</li> <li>Need to give more thought to accommodating for the elderly, couples, and single persons. Ensure there is a mix of sizes catering for smaller families and people starting to get on the housing ladder.</li> <li>Consideration should be given to how many cars will be parked since not many families have just 1 car.</li> <li>Para 63 average income stated at £46,900 is household income and not individual income. This should be clarified.</li> <li>Strongly agree with Policy 5 but there should be two slight wording changes. The wording 'preferable' weakens the statement and should be deleted. Inclusion of the 'get out' in the words 'or the scheme is made inviable' will be exploited by developers so again is left hostage to fortune.</li> </ul>	<p>Note the comments and feedback.</p> <p>Policy 4- regarding how the policy will be 'policed' this would be asking for proof of the criteria set within the policy. This could be proof of a utility bill from the current address or proof from a local employee etc.</p> <p>The local connection criteria are encouraged to be based on 3 years of being a resident, ex resident but lived in Loddon/Chedgrave within the last 3 years or the person has been working within the area for the last 3 years. However, flexibility could be given on the demand, personal circumstances and cases people put forward for this.</p> <p>Parking standards for new development are set by Norfolk County Council.</p> <p>Amended Para 63.</p> <p>Regarding wording used in Policy 5, there has to be some flexibility in the wording particularly around scheme viability.</p> <p>Note the details shared on Policy 6 regarding materials. However, some details used as examples in the plan link to the Design Codes document.</p>



Summary of Comments	NDP Response
<p><b>Policy 6</b></p> <ul style="list-style-type: none"> <li>• Keeping the character of the village is essential.</li> <li>• Red brick is too severe en mass for new builds.</li> <li>• Buff colour brick is more pleasing on the eye than red brick. Also, no grey tiles.</li> <li>• Developers have been slow in providing green and public open space provision in the plans agreed with the LPA.</li> <li>• Fear of the area being overwhelmed by development which would change the character of the area.</li> <li>• Wish to see new housing be passive including EV points, open space, and tree planting.</li> <li>• All dwellings and garages should have solar panels.</li> <li>• Sites should be completed as per their planning permission.</li> <li>• Agree building work should be in keeping with the village but do not wish to see any more housing- infrastructure cannot cope.</li> <li>• Large developments of new housing should have adequate public open space, circular dog routes and link to the existing public rights of way and dedicated cycling lanes.</li> </ul>	

## Environment Policies

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>• The majority of respondents strongly agreed or agreed with Policy 7 to 9. However, one strongly disagreed.</li> </ul> <p><b>Policy 7</b></p> <ul style="list-style-type: none"> <li>• Replacement of trees and hedges should be monitored and all new planting should have adequate aftercare.</li> <li>• Trees and woodland – is there scope to be more bold in terms of trees and woodland? A massive tree planting programme could be a massive benefit to both Loddon and Chedgrave.</li> <li>• Is there scope for the parishes to work together on a new woodland? A community woodland? A community orchard? Big blocks of woodland that are accessible for the community to use are really lacking around the Loddon/Chedgrave at the moment.</li> </ul>	<p>Note the comments and welcome the feedback.</p> <p>It is not possible to include different LGS and Views at this point in the process.</p> <p>The PC will discuss the suggestions and determine if they can be taken forward, outside of the scope of the NP.</p> <p>The NDP now includes a Monitoring and Implementation Section which encompasses community actions.</p>

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>• For parish owned grassland/amenity areas- is there scope to improve things further, with specific management plans to really enhance biodiversity and species richness.</li> <li>• A massive programme of bird box and bat box making and sharing would be great. Same with bug houses and bug hotels. Could be part of the B-Line initiative.</li> <li>• Work with surrounding farmers, encouraging them to adopt more environmentally friendly land management would be great.</li> </ul> <p><b>Policy 8</b></p> <ul style="list-style-type: none"> <li>• Wish for assurance that policies such as Policy 8 will be enforced and not earmarked for mid-term development.</li> <li>• Policy 8- The triangular piece of land with bench and oak tree at the junction of Langley Road, Hillside and Snow's Hill, should also have been included as a local green space for special protection (Chedgrave).</li> <li>• Loddon is a small town, and therefore more green spaces should have been allocated, including Farthing Green, Hales Common, Loddon Common.</li> <li>• Aware there's issues around ownership of Chedgrave Common, but maybe the use of this and the adoption of this as a real community asset would be a good idea?</li> </ul> <p><b>Policy 9-</b></p> <ul style="list-style-type: none"> <li>• Views need to be preserved not just of the landscape but of the street scenes.</li> <li>• In addition, Hardley Road towards Chedgrave Hills and Hillside towards Snow's Lane and Langley Road.</li> <li>• C4 and C1 should protect the open farmland views all round from Snows Lane to Forge Road.</li> <li>• Holy Trinity Church should also be a protected view.</li> <li>• Preservation should be a priority.</li> <li>• Important to Chedgrave and Loddon to retain the rural element of the two towns and preserve what positive environmental practices we have.</li> <li>• Our beautiful area should be protected for residents and tourists who come to enjoy the scenery, broads, and support local business.</li> </ul>	

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>Existing features such as notable trees, established hedgerows etc should be preserved where possible on new developments to benefit wildlife.</li> <li>More allotments could be allocated since Loddon has been full for some time.</li> <li>Loddon's open countryside is being targeted at present, as SNC does not have a 5 year land supply due to nutrient neutrality. Has this vulnerability been addressed?</li> </ul>	

## Economic Development

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>The majority of respondents strongly agreed or agreed with Policy 10 to 12. However, a couple were unsure/ disagreed.</li> <li>Growing employment in the area will help the viability of businesses.</li> <li>Employment sites should not be sold off for housing.</li> <li>How watertight are Policies 10 and 11? Some may suggest that local employment sites are being deliberately run down in order to render them non-viable and thus eligible for change of use e.g. to residential. How likely is this?</li> </ul> <p><b>Policy 10</b></p> <ul style="list-style-type: none"> <li>What about the Cannell's site?</li> <li>Parking on site is very important.</li> </ul> <p><b>Policy 11</b></p> <ul style="list-style-type: none"> <li>Local jobs are very important to help with community spirit and it is essential we encourage growth preferably businesses which attract higher wages and skilled employment.</li> <li>Need to encourage local business with grants</li> </ul> <p><b>Policy 12</b></p> <ul style="list-style-type: none"> <li>More variety required. Too many hairdressers, beauty salons etc. More eateries needed.</li> <li>Parking is important in Policy 12 too for the main retail route.</li> <li>Regarding retail this is important for providing local jobs and offering affordable products and services to</li> </ul>	<p>Note the support.</p> <p>Agree that growing employment/supporting businesses will help the viability of the area.</p> <p>Sympathise with the concern around local businesses not having affordable units to stay in the area. NP policies aim to support this moving forward.</p> <p>The effectiveness of NP policies on influencing planning decisions will be monitored once the plan has been 'made'.</p>

Summary of Comments	NDP Response
<p>local people. Chedgrave has been hard hit by doubled rent and pushing local businesses out. As well as this the industrial site is being cleared out and there are no other affordable business units locally meaning most businesses have to shut down.</p> <ul style="list-style-type: none"> <li>• Loddon is a conservation area and must always be so- if people want more shops they can travel to Norwich or Lowestoft.</li> <li>• Re-develop the fire station plot and move the fire station to the industrial estate. Create more retail units built within the old town style.</li> </ul>	

## Recreation

Summary of Comments	NDP Response
<p><b>Policy 13</b></p> <ul style="list-style-type: none"> <li>• The majority of respondents strongly agreed or agreed with Policy 13.</li> <li>• All residents/visitors should be encouraged to utilise public footpaths for their health &amp; wellbeing, cutting back short, distanced driving and since they are important recreational facilities.</li> <li>• Should the policy be reworded to footpaths/rights of way?</li> <li>• Landowners should be compelled to keep footpaths maintained.</li> <li>• Awaiting repairs and maintenance on some footpaths in the area including along the Chet and the bridge at Staithe.</li> <li>• The early re-establishment of the Wherrymans Way around Hardley Flood is necessary- it encourages tourism and provides an amenity to residents/visitors.</li> <li>• Disagree with the path being shown off Big Back Lane, which is on private arable land</li> <li>• If Langley Road development is approved, will single footpath/pavement along Langley Road towards village and Loddon be improved one needs to cross this busy road several times to get to Loddon.</li> <li>• If someone is walking/cycling on the south side of Loddon, there are no safe points to cross the A146.</li> <li>• Hope to not see upgraded surfaces to footpaths spoil the countryside nature of footpaths. Any hard surfacing to be maintained else it degrades. Need a balance</li> </ul>	<p>Note the comments/feedback.</p>

Summary of Comments	NDP Response
between nature and human access. Paths should not be bikeable.	

## Infrastructure

Summary of Comments	NDP Response
<p><b>Policy 14</b></p> <ul style="list-style-type: none"> <li>The community facilities are under pressure, need the help they can get (either via CIL or grants) and should be protected to ensure there is sufficient provision of these.</li> <li>Should the gardens and footbridge be in this section? Since the bridge goes to nowhere unless there is a plan for this to be opened?</li> <li>Community facilities - the library building is the old school, and houses the Council and Community Gym too, so would be more appropriate to call 'the old school' and list the organisations within. It is also an old building that needs to be retained and should be a community building and maintained.</li> <li>Whilst agreeing strongly with Policy 14 the absence of sporting facilities / sports ground other than Jubilee Hall for indoor activities seems a missed opportunity.</li> </ul> <p><b>Policy 15</b></p> <ul style="list-style-type: none"> <li>How enforceable is this? At the proposed Langley Rd site the developer claims this is within easy walking distance to the village centre/bus routes. However, most residents in reality will use their cars.</li> <li>Langley Road development. Is this a safe route?</li> </ul> <p><b>Policy 16</b></p> <ul style="list-style-type: none"> <li>The medical hub is essential for the area and people outside of the Loddon/Chedgrave. The provision of medical/dental facilities and staff should be a priority and we need to support improving/expanding the already busy centre especially if there will be more development going up in the area for the increasing population.</li> <li>Dentist provision is still not adequate, NHS dentists should be a priority for all but particularly for children. How will the medical practice cope if new developments are approved.</li> </ul>	<p>Note the comments.</p> <p>Policy 15 – Development should be encouraged in sustainable locations with access to services and public transport. Whilst residents may still choose to use their cars for short distances, the NP policies aim to bring about behavioural change by promoting walking/cycling instead by ensuring adequate infrastructure is available.</p> <p>Note the concerns around medical hub/community infrastructure. The NP aims to support the viability and improvement of these if the opportunity arises.</p>

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>Safe routes must always be part of the policy.</li> <li>It would have felt more natural for the next policy to have been 'walking and cycling', and community facilities to have become policy 15.</li> <li>New housing should have a levy, perhaps to support the establishment of a medical hub in hope of being able to staff such a hub.</li> </ul>	

## Heritage

Summary of Comments	NDP Response
<b>Policy 17</b> <ul style="list-style-type: none"> <li>Conservation areas are essential to retain the character of both villages, we should maintain the uniqueness of these and protect them.</li> <li>Any development must take account of the affect it will have on the conservation areas.</li> <li>Heritage is important but there are too many stipulations which could result in buildings falling into disrepair due to the costs being too high.</li> <li>Avoid building developments which ruin the character of the area.</li> <li>Snows Lane/Langley Road needs to be maintained i.e., don't build on the field. This would destroy the 'feel' of our lovely village town if allowed.</li> </ul>	<p>Note the comments.</p> <p>Agree with protecting and ensuring development has regard to the conservation areas.</p>

## General feedback given at the Reg.14 stage by residents.

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>Around 97% (32 out of 33) of respondents are in favour of the Chet NP at this stage.</li> <li>The number of new homes planned for the area will have a big impact on existing residents.</li> <li>Concern about the noise and pollution that will be caused through construction of new homes.</li> <li>Concern that with the expansion of new homes/residents there will be a lessened attraction of our villages due to the increase in population. This is due to an increase in traffic, congestion, noise, pollution and increase in construction vehicles due to the development of new dwellings.</li> <li>No further large developments should be considered.</li> </ul>	<p>Note the comments and welcome the supportive feedback.</p> <p>Understand the concerns of residents relating to the volume of new homes planned for the area. The aim is for this NP and the policies it contains to influence design and mix of homes, amongst other things.</p> <p>Whilst we understand that some residents wish to see no more development this is not something the NP can do. A NP must be supportive of sustainable development and</p>

Summary of Comments	NDP Response
<ul style="list-style-type: none"> <li>• Concern for the welfare of the centre of Loddon with the Church Plain being congested with people and cars.</li> <li>• Concern that local services will not be able to cope with the increase in population which is felt by current residents.</li> <li>• Concern that the sewage system cannot cope and unaware of plans to improve this.</li> <li>• We need all of our shops not more housing.</li> <li>• Recognise that expansion is inevitable and support well designed, eco-friendly, well-connected developments in keeping and at an appropriate scale.</li> <li>• Generally, in favour of the plan but do not have much confidence all aspects will be implemented in the coming years.</li> <li>• Comprehensive/forward looking plan which would provide strong guidance for the future of the area.</li> <li>• Policies outlined are well thought out.</li> <li>• Putting the environment at the heart of the document is fabulous to see. Perhaps it will provide a model for other local plans as yet unwritten.</li> <li>• Do not think it's been made easy for the majority to comment.</li> </ul>	<p>cannot be used as a way to stop development in its entirety. It is an aiding tool to ensure development coming forward has regard to local interests including design, housing mix and so forth.</p>

## Appendix A: Stakeholder Email for Regulation 14

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**From:** Neighbourhood Plan <[neighbourhoodplan@loddonpc.org.uk](mailto:neighbourhoodplan@loddonpc.org.uk)>  
**Sent:** Sunday, June 4, 2023 10:32 PM  
**Subject:** Chet Neighbourhood Plan Pre-Submission Regulation 14 Consultation

Dear Stakeholder

### **Chet Neighbourhood Plan Pre-Submission Regulation 14 Consultation**

The Chet NP is being prepared by Loddon parish council, as the lead qualifying body, whilst working with Chedgrave parish council to produce a joint neighbourhood plan. The parishes are now consulting on their Pre-Submission Draft of the neighbourhood plan for Loddon and Chedgrave. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of 8 weeks from 5 June 2023 to 30 July 2023.

The consultation offers a final opportunity for you to influence the Neighbourhood Plan before it is submitted to the South Norfolk District Council and the Broads Authority.

All comments received by 30 July 2023 will be considered by the Neighbourhood Plan Steering Group and may be used to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Plan at a future date.

The Pre-Submission Plan and supporting evidence can all be found online: [www.chetnp.info](http://www.chetnp.info)

Should you wish to provide comments you can send these to the Neighbourhood Plan Project Officer via email [neighbourhoodplan@loddonpc.org.uk](mailto:neighbourhoodplan@loddonpc.org.uk) or send them to Loddon & Chedgrave Neighbourhood Plan, C/O Loddon Parish Council, The Library Annexe, Church Plain, Loddon, Norwich, NR14 6EX.

Yours faithfully

**C J Petersen**

Carla Petersen  
Neighbourhood Plan Project Officer

**Loddon & Chedgrave Neighbourhood Plan**  
**C/O Loddon Parish Council**  
The Library Annexe, Church Plain,  
Loddon, Norwich, NR14 6EX

**01508 522 020 (Office is open 9am – 12 midday, Tuesday, Wednesday and Thursday)**  
**01508 486 128 (Emergencies only)**

[www.loddonpc.org.uk](http://www.loddonpc.org.uk)  
[www.facebook.com/LoddonPC](https://www.facebook.com/LoddonPC)



## Appendix B: Article included within Chet Contact about the Regulation 14 Consultation



**Loddon & Chedgrave  
Neighbourhood Plan  
2022-2042**

### **Public Consultation Pre-submission (Draft) Neighbourhood Plan**



**Regulation 14 Consultation Period  
5 June 2023 to 30 July 2023**

We hope you have been able to attend one of the Consultation Events and have given the Steering Group your views. If not, you have until the end of July to view The Plan, which is available to view in the library, or via the QR code below.

At the end of the summer, The Plan is sent to The Planning Inspectorate for examination. They decide if it is okay and make any necessary legal changes. You, the residents, then get a chance to vote at a referendum to decide whether or not The Plan becomes part of Chedgrave's and Loddon's Planning Rules. Please do look at The Plan and complete the survey as set out below.

All the consultation documents will be available to view on our website:  
[www.chetnp.info](http://www.chetnp.info)

Hard copies of The Plan and Summary Document will be available in Loddon Library and Chet Stores. The Summary Document will also be available in Jubilee Hall entrance, Brian Clarke Rooms, Loddon Garden & Seed and Rosy Lee's.

Scan the QR code to complete a short survey.

Complete the short survey on this link:  
<https://www.smartsurvey.co.uk/s/ChetSurvey/>

Email: [neighbourhoodplan@loddonpc.org.uk](mailto:neighbourhoodplan@loddonpc.org.uk)

Facebook: Loddon & Chedgrave Neighbourhood Plan





## Appendix C: Banners advertising the Chet NP and consultation events



## Appendix D: Photos of displays used during Regulation 14 Consultation



