

Ref.	Title	First Name	Surname	Position / Dept.	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
ANP1	Miss	Emily	Halliwell	Sustainable Places	Environment Agency	General				✓	No comment
ANP2	Dr	Shamsul	Hoque	Assistant Spatial Planner	National Highways	General				✓	National Highways is responsible, on behalf of the Secretary of State, for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England. Within and surrounding the Acle Neighbourhood Plan area, we are responsible for the A47 trunk road, including the A47 roundabout junction located within the Neighbourhood Plan area. We have completed our review of the Draft Modified Acle Neighbourhood Plan 2025-2040; Submission Version (Regulation 16), dated May 2026. We note that the extension of the Neighbourhood Plan period to 2040 aligns its timeframe with that of the Greater Norwich Local Plan (GNLP), which provides the long-term strategic framework for the area. The GNLP covers the Broadland District as well as the Broads Authority area. Once adopted, the Neighbourhood Plan will form a material consideration in the determination of planning applications within Broadland District Council and/or the Broads Authority. Where relevant, National Highways will act as a statutory consultee on future planning applications within the Neighbourhood Plan area and will assess the potential impacts on the SRN accordingly. Notwithstanding the above, we have also reviewed the supporting document titled "Acle Neighbourhood Plan Basic Conditions Statement", (May 2026). We note the legislative updates introduced through the Levelling Up and Regeneration Act 2023 in relation to neighbourhood planning. National Highways has no comments on the Plan in respect of its conformity with the Basic Conditions.
ANP3		Lorraine	Houseago	Historic Environment Assistant	Norfolk Historic Environment Record	General				✓	We have no comments to make regarding the proposed revised neighbourhood plan.
ANP4	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	Policy ACLE9: Improving Health, Accessibility and Connectivity (p.57)	✓				We support the inclusion and intention of this policy. We particularly support the provision of a network of green walking/cycling routes.
ANP5	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	Policy ACLE10: Flood Risk (p.61)	✓				We support inclusion of this policy, especially as there are areas within the parish which are at a significant risk from flooding. We support the additional text to ensure that this policy is robust and maximises opportunities for SuDS as well as the additional sentence around using SuDS features such as swales and rain gardens, to be integrated along the verges of roads/residential streets and along active travel routes.
ANP6	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	Policy ACLE11: Light pollution and Dark Skies (p.63)		✓			Due to the known adverse impacts on nocturnal wildlife from light pollution, we welcome inclusion of this policy. We recommend including a footnote with a link to the guidance mentioned above: Guidance Note on Bats and Artificial Lighting at Night - GN08 Bats and Artificial Lighting (https://theilp.org.uk/resource/gn08-bats-and-artificial-lighting-pdf.html)
ANP7	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	Policy ACLE12: New and Existing Green Spaces (p.67)		✓			We support this policy. 'New green spaces' - we particularly support the wording that 'Proposals for new housing development should include quality outdoor green amenity space'. As multifunctional benefits of green infrastructure cannot be underestimated, we would welcome additional wording to make it very clear that new housing development must demonstrate that green infrastructure is at the heart of new development and that it should provide the framework for new design layouts.
ANP8	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	Policy ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			We strongly support this policy. The State of Nature report highlights the significant historical losses that have occurred across the UK and safeguarding what remains of our natural heritage is a vital cornerstone in nature's future recovery. We strongly support the text in paragraph 10.29 which provides support for an ambition of 20% Biodiversity Net Gain as this will provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature. We recommend that this reference is included in the policy text itself to give this greater strength. 'Trees and hedges' - trees and other vegetation provide numerous and significant benefits. We welcome this section of the policy and particularly inclusion of wording concerning species selection which includes a mix of native and climate-resilient species. The Woodland Trust guidance suggests that in order to go above and beyond standard policies, neighbourhood plans could set a specific requirement that trees are replaced on a 2 to 1 or 3 to 1 ratio. We therefore recommend that a specific target is set. We recommend including wording around the protection of any roadside green verges as these also have ecological value.
ANP9	Dr	Sarah	Eglington	Policy and Campaigns Officer	Norfolk Wildlife Trust	ACLE15: Responding to Climate Change (pp.88-89)		✓			There is huge potential of neighbourhood planning to add to, and reinforce, climate change policy at a local level. Climate change is one of the most significant and fastest growing threats to society. Currently, there is no mention of water sustainability within this policy, only a vague mention of 'water management measures'. New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plans. However, as Acle is within a water-stressed region, we recommend that a higher standard of water efficiency (e.g. max of 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems.
ANP10	Mr	Ross	McGivern	Historic Places Advisor	Historic England	General				✓	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide additional comments at this time. However, we are pleased to see our previous comments have been taken into account. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/
ANP11	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Objective 2 – Business and Employment (p.27)	✓				The Broads Society supports this objective aimed at enhancing the attractiveness, vitality and viability of Acle for employment, retail, tourism and commercial uses.
ANP12	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Objective 3 – Community and Leisure (p.27)	✓				The Broads Society supports this objective.
ANP13	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 6 – Acle Bridge Improvements (p.51)	✓				The Broads Society fully supports this policy aimed at safeguarding the Acle Bridge area for high quality leisure and tourism uses and for marinas and moorings. The Society also welcomes the potential for improved cycle and pedestrian links between Acle Bridge and Acle.
ANP14	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Objective 4 – Movement and Transport (p.27)	✓				The Broads Society supports this objective which encourages safe, convenient and accessible pedestrian, cycling and vehicular access within Acle and beyond.
ANP15	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 9 – Improving Health, Accessibility and Connectivity (pp.57-58)	✓				The Broads Society fully supports this policy particularly the potential to improve or provide new routes between iv. The Village Centre and Acle Bridge and vi. From Acle to Upton and Fishley.
ANP16	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Objective 5 – Natural Environment (p.27)	✓				The Broads Society fully supports this objective which aims to protect and enhance the local natural environment.
ANP17	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 10 – Flood Risk (p.61)	✓				The Broads Society welcomes this policy which states that all new development should be directed away from areas at risk of flooding from the river, the Broads and other waterways.
ANP18	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 11 – Light Pollution and Dark Skies (p.63)	✓				The Broads Society supports this policy which states that the proximity to the Broads and the area's intrinsically dark skies should be taken into account in respect of any development that includes new lighting.
ANP19	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 12 – New and Existing Green Spaces (p.67)	✓				The Broads Society welcomes the designation and the protection of local green spaces particularly 20. Roman Wood and 21. Damgate Wood.
ANP20	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 13 – Biodiversity and Ecological Corridors (pp.75-76)	✓				The Broads Society supports this policy aimed at protecting, improving and enhancing existing ecological networks, wildlife corridors and priority species throughout the Parish.
ANP21	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 14 – Landscape and Important Public Views (p.86)		✓			The Broads Society supports the protection of important public views across the countryside particularly G. Views east across the marshes from Roman Wood – Note that the submitted document wrongly refers to this as views WEST – and H. view from riverside footpath toward Acle Bridge.
ANP22	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 15 – Responding to Climate Change (pp.88-89)	✓				The Broads Society supports this policy particularly where non-domestic scale renewable energy proposals should be directed away from the Broads area, including the Halvergate Marshes Conservation Area.

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ANP23	Mr	Martin	Thirkettle	Planning Advisor	The Broads Society	Policy ACLE 16 – Heritage (p.95)	✓				The Broads Society supports the designation of Charlie Water’s Drainage Mill as a non-designated heritage asset and welcomes any protection that this policy gives to buried archaeology and to the Halvergate Marshes Conservation Area.
ANP24				Planning	Broadland District Council	General comments		✓			The Council considers that this is a very positive and comprehensive review of the original Neighbourhood Plan. It is clear from the Consultation Statement that the comments raised by the Council at the Regulation 14 stage have been considered by the Qualifying Body and that a number of changes have been made in order to address the majority of these issues. The representations below highlight several areas where Broadland District Council still considers that changes are necessary in order for the Plan to meet the basic conditions. One of Broadland District Council’s general comments during the Reg. 14 consultation stage was that referring to ‘existing’ policies is quite ambiguous, particularly now that the revised Neighbourhood Plan has been submitted. It is noted that several amendments have been made to such text throughout the document. However, some examples remain – on page 4 and in paragraphs 2.6, 5.2, 5.4, 7.5 and 10.28, for example.
ANP25				Planning	Broadland District Council	Statement on significance of modifications (Submission stage)			✓		In the Parish Council’s ‘ Statement to accompany Submission Version, May 2026 ’, it is noted that the Parish Council does not consider that the proposed modifications to the Neighbourhood Plan are so significant as to change its nature. The statement highlights that two policies have been deleted and the remaining nine policies from the original 2015 Plan have been modified (in many cases, merged with other policies). However, nine new policies have been added to the Plan, representing over 50% of the policy content of the revised document. These largely deal with matters relating to the natural environment and landscape (absent from the 2015 Plan), including the designation of local green spaces where there were none previously. New policies also address key matters such as the scale, type, tenure and location of new housing, and new cemetery provision. Broadland District Council’s view on this matter is that the proposed scale of modifications (to a Plan which is 11 years old) are likely to change the nature of the original document. As well as the stronger focus on the natural environment, there is also now an accompanying design code and housing needs assessment, which both support more comprehensive housing and design policies.
ANP26				Planning	Broadland District Council	ACLE1: The Design of New Development (p.34)		✓			As stated during the Reg. 14 consultation, the District Council considers the use of the term, ‘must not’ (in point 1.iv) to be too much of a blanket restriction. We would suggest replacing the term with ‘should not normally exceed’ or similar. In addition, we consider that our previous comments in respect of point 1.viii (‘Roofline’) still apply – we would recommend the policy avoids specifying roof pitches, as variety is important in a rural area. Thirty-degree roof pitches are only really seen on early nineteenth century slate roof houses. The minimum pitch for a thatched roof (which remains on formerly thatched roofs) is 45 degrees. In addition, the wording refers to pantiles being used on pitches of 40-50 degrees – however, this is at odds with the earlier statement that the traditional roof pitch is 30-40 degrees. In addition, the wording of this point does not clarify what is expected from development. As regards point 1.ix, it is normally acceptable to consider some alterations to boundary treatments even for listed buildings (e.g. slight widening of access for modern vehicles.). It seems overly restrictive to state ‘must not be chopped through’ – we would also query this terminology. We do not believe there is any planning control over cutting down hedgerows belonging to properties in a conservation area (let along a hole through a hedge), unfortunately. We assume that ‘original’ means when built rather than existing. It is difficult in many circumstances to know what the original boundary was for an older property and if it is not original then this element of the policy won’t apply. There may be circumstances where a boundary treatment is not considered particularly beneficial (e.g. concrete walls). There is an error with the Roman numeral formatting in the last three headings under CV.01 (i.e. the numerals are not present). The two headings under CV.02 should then be numbered xxi and xxii.
ANP27				Planning	Broadland District Council	Paragraph 6.24 ‘Residential Car Parking’ (p.42)		✓			All new houses are now required to have electric charging points, as set out in Building Regulations.
ANP28				Planning	Broadland District Council	ACLE2: New Housing in Acle (p.40)		✓			‘ Size ’ - The policy, at present, focuses predominantly on the need for 3-bedroom dwellings, as mentioned in the HNA. However, the HNA also notes the projected increase in residents over the age of 65 which 3-bedroom dwellings are unlikely to cater for. One and two-bedroom affordable dwellings are also unlikely to meet this need. The need for specialist housing and annexes, expressed later in the policy, will contribute towards meeting the needs of those aged over 65 somewhat. However, it should be acknowledged that not everyone over the age of 65 will want or require these types of dwellings. Some reference to the need for smaller market housing would be supported by the evidence and supported by the Council.
ANP29				Planning	Broadland District Council	ACLE4: Village Centre	✓				It is positive to see the criteria added relating to ‘living over the shop’ that states the uses must be compatible, as suggested by the Council during the Reg. 14 consultation stage.
ANP30				Planning	Broadland District Council	ACLE5: Mixed Uses and Underused and Vacant Land (p.49)		✓			As stated previously, as currently worded the first part of the policy would appear to limit the redevelopment of vacant land to that located in or adjacent to the village centre. The policy needs to be made clearer that it applies to mixed use schemes in or adjacent to the centre of the village (i.e. criterion ‘a’ should be removed and should instead form part of the opening statement). Criterion ‘e’ potentially creates some tension with ACLE4 in that, whilst the preference is for off-street parking, ACLE4 does acknowledge scenarios where this could be unavoidable. This is not acknowledged in ACLE5. Could the criterion state that parking should meet the requirements of other policies in the plan? Re. criterion ‘h’ – we consider this would be more effective if it referenced the Design Codes & Guidance and, in particular, the design guidelines for the specific character area in which the proposal is located.
ANP31				Planning	Broadland District Council	ACLE7: Education and Health Provision (pp.53-54)		✓			Primary and Pre-school Provision – it is not clear what the aim of this criterion is. The previous policy had a clear aim which was to provide new and enhanced provision. This new criterion is unclear and will be difficult to apply effectively. Health Care Provision – this section states that proposals will be ‘generally supported in, subject to the detail’. The word ‘principle’ seems to have disappeared. This could simply state ‘generally supported’, as this does not give blanket support but remains a positive statement.
ANP32				Planning	Broadland District Council	ACLE8: Cemetery Provision (p.55)		✓			We recognise that further justification has been added to paragraph 8.10 of the supporting text, following our comment during the Reg. 14 stage. However, the policy still states ‘where a need for new cemetery provision is established...’. This brings a level of ambiguity to the policy – it would appear from 8.10 that the need exists, so we are unclear why the policy is introduced in this way?
ANP33				Planning	Broadland District Council	ACLE9: Improving Health, Accessibility and Connectivity (pp.57-58)		✓			New Routes and Connections – it would be helpful to developers and decision makers if these routes and connections could be plotted on a map, to be featured within the Neighbourhood Plan. Existing Public Rights of Way – in the first sentence, we consider that the word ‘must’ is too stringent. In fact, the second part of this paragraph details how any exceptions to this requirement should be dealt with. We recommend that ‘must’ is replaced by ‘should’.
ANP34				Planning	Broadland District Council	ACLE10: Flood Risk (p.61)		✓			As stated during the Reg. 14 consultation, we consider that requiring all new development to seek to achieve lower than greenfield run-off rates is not a proportionate approach and is too rigid. We would suggest that the policy could take a more supportive approach – e.g. ‘...and achieve greenfield runoff rates or better, where feasible.’ Generally, policy wording at the local and national level states that development should not increase flood risk elsewhere and should include SuDS measures that reduce surface water runoff (paragraphs 181/182 in the current NPPF 2024, Policy F2 in draft NPPF 2025). However the NPPF does not use the term, ‘must’. Therefore, including this term in ACLE10 (paragraph 3) could be seen to contradict national policy and could be argued as being overly stringent.
ANP35				Planning	Broadland District Council	ACLE12: New and existing green spaces (pp.67-68)		✓			The Council previously raised concerns with the wording of the penultimate paragraph, which requires new green spaces to be ‘provided for major developments’ and for these to be ‘phased for every 25 dwellings constructed’. Our concern was the lack of clarity over whether this is intended to apply to single applications of over 25 dwellings or whether it was intended to be cumulative, over a number of applications. The insertion of ‘major development’ into the policy text of the submission version of the plan implies that it is intended to apply to single applications. However, ‘major development’ could encapsulate a proposal of 10 homes or above which, again, poses issues with the policy requirement. In addition, despite our understanding of the intention, there is no discussion or evidence supplied for this element of the policy within the supporting text, including how the figure of 25 dwellings has been arrived at.
ANP36				Planning	Broadland District Council	Paragraph 10.23 ‘Biodiversity’ (p.68)		✓			The final sentence refers to the ‘Broads Ramsar’ – the correct designation is ‘Broadland Ramsar’.
ANP37				Planning	Broadland District Council	Paragraph 10.28 ‘Biodiversity’ (p.71)		✓			The final sentence states ‘Planning applications are now required to quantify the different habitat types on site both before and after the proposed development using the latest Biodiversity Metric.’ This should read, ‘Unless exempt, planning applications are now required...’, as not all planning applications are subject to statutory BNG.
ANP38				Planning	Broadland District Council	Paragraph 10.29 ‘Biodiversity’ (p.71)		✓			The first sentence states, ‘A minimum of 10% net gain in biodiversity will be required either on-site or via enhancement elsewhere within the parish.’ It is not possible to make BNG delivery mandatory within the parish. Applicants can meet their off-site BNG commitment using credits purchased from a third-party provider or using statutory credits – both of which can be from sites anywhere in the country. The second sentence states, ‘BNG is mandatory for all sites.’ This is not correct – there are exemptions. The third sentence includes the following clause, ‘...looks ahead with in principle support for a move towards a 20% net gain where this is achievable.’ This is quite vague – would it extend to requiring developers to secure the 20% using off-site credits, or would it only mean 20% if delivered on-site? This would perhaps need to be considered against any viability statement.

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ANP39				Planning	Broadland District Council	ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			Broadly speaking, ACLE 13 tends to repeat national legislation and policy relating to BNG – there is no need to do so. In addition (as regards the 2nd paragraph), not all proposals are required to deliver 10% BNG. As regards the third paragraph, the BNG mitigation hierarchy is written into the Environment Act which looks to enhance existing habitats on-site prior to the creation of new on-site habitats. We would suggest the order of this list should be revised accordingly. It is not clear what the intention is behind paragraph 4, as it doesn't specify any particular requirement of developers in relation to these corridors. Is there an intention that these will be protected from development, or would development need to contribute to their maintenance in some way? Point iv. of paragraph four of the policy refers to an 'Ancient Hedgerow'. We have previously commented that this is not a recognised designation, in planning terms. This is as opposed to 'Important Hedgerow', which is defined under the Hedgerow Regulations 1997. The Qualifying Body responded to state that there is a formal definition of the term provided by the Woodland Trust. We have not been able to source this, but have instead found a definition provided by the Invertebrate Conservation Trust. This has, in fact, been referred to in the Neighbourhood Plan Glossary. It would aid clarity if this definition and source were to be provided in a footnote to the policy text. In addition, we would query why this hedgerow does not appear in the list of important trees, hedgerows and trackways set out in Appendix D. As regards paragraph 7, paths within tree belts are not required for wildlife to connect with open spaces. 'Trees and Hedges' – one veteran feature does not make a tree a veteran. Many trees have veteran features, such as flaking bark or rot cavities. Veteran trees are now defined as irreplaceable habitat in the Environment Act and there would need to be a very good reason (i.e. an NSIP) for their loss being justified. A statement in an Arboricultural Impact Assessment would not be sufficient. 'Wildlife Measures' – we would suggest that other bird boxes should also be included within the list of measures. Consideration should also be given to the inclusion of integrated bat boxes.
ANP40				Planning	Broadland District Council	ACLE14: Landscape and Important Public Views (p.86)		✓			Whilst we appreciate that views A, B and C are deemed to be important, there is a tension in that the field being overlooked by these views (between Norwich Rd and Mill Lane) forms part of the GNLp allocation, B.AC.1, which allocates this land and land north of Mill Lane for a total of 340 dwellings. The response from the Qualifying Body to our Regulation 14 representation on this matter is that it is possible for the developer to retain a small arc of the views. However, our concern is whether the wording of the first paragraph of the policy is too stringent to allow a scheme to come forward which respects ACLE 14 but is also policy-compliant with the GNLp. The wording, '...to the detriment of the view as a whole...' is very subjective and, if taken literally, could be regarded as meaning any development visible within an identified view, even where the effect is minor. In addition, the first and second paragraphs do not complement one another. The first explicitly states that any detrimental impact on a view as a whole will not be supported, whereas the second requires that a statement should be provided to show how the view has been considered, along with a reference to significant adverse impact. This is a stronger and more reasonable criterion to be able to apply as it provides a threshold for applications to be considered, rather than what is essentially a blanket ban as set out within the first paragraph. We also consider the wording could be framed more positively, setting out in what circumstances proposals affecting an important local view will be supported (e.g. where it conserves or enhances the key features and compositional elements of the view; where it does not result in significant adverse intrusion into the view corridor, for example).
ANP41				Planning	Broadland District Council	ACLE15: Responding to Climate Change (pp.88-89)		✓			In the penultimate paragraph, it is stated that 'the minimum distance of newly planted tree canopies on the edge of the countryside must be 2 metres at the point of full maturity'. This requirement is quite ambiguous and would be difficult to deliver. In addition, the planting of trees within the break may be seen by some parties as providing potential fuel for any wildfires, which the policy is trying to prevent. It may be better to re-phrase this as a general requirement for sensitive planting between the settlement edge and the countryside.
ANP42				Planning	Broadland District Council	ACLE16: Heritage (p.95)	✓				Halvergate Marshes Conservation Area – we note that this section has been reworked and it now provides much clearer guidance.
ANP43				Planning	Broadland District Council	Appendix D: Important Trees, Hedgerows and Trackways (p.117)		✓			As stated previously, it would be useful to know explicitly which of the entries comes under which category, and what the criteria for inclusion are. As the term 'Important Hedgerows' has legal status, is it the case that those included in this list meet the criteria of the Hedgerows Regulations? There is a need to be especially clear on this.
ANP44				Planning	Broadland District Council	Appendix E: Glossary (pp.118-125)		✓			We would suggest that 'County Wildlife Sites' and 'Roadside Nature Reserves' should be added to the Glossary. 'Ancient or veteran tree' - veteran trees do not have to be very old; it is the presence of significant decay features that sets them apart. They are irreplaceable habitats see https://www.gov.uk/guidance/irreplaceable-habitats ; also see https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions . 'Local Nature Partnership' – this could usefully refer and provide a link to the Norfolk and Suffolk Nature Recovery Partnership (https://www.nsnrp.org/) and refer to the Norfolk Local Nature Recovery Strategy (https://www.norfolk.gov.uk/article/73317/Norfolks-Local-Nature-Recovery-Strategy).
ANP45		Natalie	Beal	Planning Policy Officer	Broads Authority	Statement on significance of modifications (Submission stage)			✓		A referendum is needed as the plan is much changed.
ANP46		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 3.5 'Introduction to Acle' (p.18)		✓			This refers to the 'Norfolk and Suffolk Broads' – replace with 'the Broads'.
ANP47		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE1: The Design of New Development (p.34)		✓			Page 36, GV.02 Sustainable Drainage Schemes and fire prevention. Should these be two separate policies? SUDS and fire protection don't seem to be intrinsically linked in any way. Page 36, GV.02.2 Fire Prevention – should this also include ensuring that electric charging points for cars / bikes etc are not positioned immediately adjacent to the dwelling? Page 36, CV.012 Legibility and Wayfinding - I would still suggest that rather than the first sentence being a statement ('Streets contribute to the character of the area...' which is a bit unnecessary, as a policy it should state, 'Streets should contribute to the character of the area.'. Likewise, it is not clear what is meant by 'Pedestrian routes should be furnished...'. How should they be furnished? I would suggest this should be reworded to state, 'Pedestrian routes should be integrated into the existing street network'.
ANP48		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE2: New Housing in Acle (p.40)		✓			Affordable housing section – what is a 'mixed development site'? Specialist housing section – first para ends with 'and prevention'. Prevention of what? Specialist housing section – second para - which Local Plan policy does that refer to?
ANP49		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE3: Residential Car Parking (p.43)		✓			Policy ACLE 3 is about car parking. But the 4th para under Design is about road design.
ANP50		Natalie	Beal	Planning Policy Officer	Broads Authority	Figure 16: Acle village centre (p.46)		✓			Is that the village centre in the 2026 Neighbourhood Plan? If so, suggest you remove reference to the 2015 Neighbourhood Plan as that is superfluous and can cause confusion.
ANP51		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE5: Mixed Uses and Underused and Vacant Land (p.49)		✓			Criterion a – what about if the vacant site is not within the centre? Would redevelopment not be supported?
ANP52		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 8.1 'Community and Leisure' (p.50)		✓			This refers to the 'Norfolk and Suffolk Broads' – replace with 'the Broads'.
ANP53		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 9.5 'Movement and Transport' (p.57)		✓			This refers to the Norfolk Broads, replace with the Broads Authority.
ANP54		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE9: Improving Health, Accessibility and Connectivity (pp.57-58)		✓			Improving health, accessibility and connectivity - Para 2 - 'These must be accessible for a variety...providing an appropriate minimum width and be barrier free'. Barriers include gates, chicanes, over grown vegetation, lighting, feeling safe, surfacing. Access control barriers should not limit those walking, wheeling or cycling.
ANP55		Natalie	Beal	Planning Policy Officer	Broads Authority	Policy ACLE11: Light Pollution and Dark Skies (p.63)		✓			This needs to refer to justifying the need for lighting in the first place. The Consultation Statement says in response to a similar comment made at the Regulation 14 stage 'There is no national requirement for lighting to be justified in the first instance'. There is no national requirement for most of the policies or stances you take in the policies. So, the reason for not seeking justification for lighting in the first place is not clear and has not adequately been explained. I also note that the Design Code says this: 'CV.01.6 External lighting i. Any proposed street lighting must be fully justified at the onset of design.'
ANP56		Natalie	Beal	Planning Policy Officer	Broads Authority	ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			End of first paragraph... you refer to buffer zones, but no detail is given. It is not clear how a Development Management Officer can use that instruction. It is not the Parish Council that will determine the application. This needs clarifying and elaborating. Policy ACL13 says 'Any development site which contains tree belts should facilitate access to and through them with footpaths and cycleways, as appropriate, for both wildlife and people to connect with open spaces, the Broads and the surrounding countryside, wherever possible, in order to maintain and enhance the rural character'. This may need to be caveated as such routes could result in more people going to protected sites. So care is needed with this wording. The policy needs to say 'subject to the findings of a project level HRA' or the like.

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ANP57		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 10.36 'Landscape and Important Views' (p.77)		✓			This refers to the Norfolk and Suffolk Broads – replace with the Broads. Reference should also be made to the Broads Authority's Landscape Character Assessment SPD adopted in 2026.
ANP58		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 10.40 'Landscape and Important Views' (p.78)		✓			The Broads Landscape Character Assessment is now a SPD and has been updated recently: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0018/152442/Design-Guide-and-Code-for-the-Broads-Supplementary-Planning-Document.pdf See also footnote 33.
ANP59		Natalie	Beal	Planning Policy Officer	Broads Authority	Figure 48: Important Public Views (p.85)		✓			This needs to show the Broads Authority area please.
ANP60		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 10.48 'Fire breaks' (p.87)		✓			First sentence – the LNRS will inform site selection of what?
ANP61		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraphs 10.53-10.59 'Non-designated Heritage Assets' (pp.91-93)		✓			Non designated heritage assets – 10.53 onwards. So the plan does not identify new NDHAs? As policy ACLE16 does not include any... this needs clarifying.
ANP62		Natalie	Beal	Planning Policy Officer	Broads Authority	Paragraph 11.1 'Implementation' (p.98)		✓			Does this new Neighbourhood Plan replace the current one? Is that stated anywhere? This paragraph, as written, could imply that both are in place.
ANP63		Natalie	Beal	Planning Policy Officer	Broads Authority	Appendix C: Justification for Local Green Spaces (p.102-116)		✓			Appendix C is already in the main part of the Neighbourhood Plan. Does it need to be in the Plan twice?
ANP64		Natalie	Beal	Planning Policy Officer	Broads Authority	Appendix D: Important Trees, Hedgerows and Trackways (p.117)		✓			As LPAs that will use this Plan, what are we meant to do with Appendix D? Should these be plotted on a map?
ANP65		Natalie	Beal	Planning Policy Officer	Broads Authority	Design Guidance & Codes		✓			These comments were made at Regulation 14 stage and have not been changed or reasons for not changing the Design Guide have not been given. - Design Guide and Code 2.3.1 – are there peak hour services for buses and rail? This needs to be clarified. Figure 21 and page 22, middle column, bottom para is as the crow flies and is not a realistic representation of what can be reached by foot and cycle. This needs to be replaced with an assessment of what is within those distances, using the routes a cyclist or pedestrian will take. Page 10 – it is noted that BDC's LCA is referenced on page 9 so should the BA's LCA be referenced on page 10? Page 19, Figure 15 – it would be good to have a bit more differentiation in colour between Watercourses and flood zones on this map - Page 10, please reference the BA's newly adopted LCA SPD - Page 19, figure 15 – there is no differentiation between the colour of the watercourses and flood zones on the map. Please can this be amended? - Page 31 and Figure 27 This doesn't show or mention the fire break that is required by the Policy in the NP. It might be good to be able to show how the design of this could be successfully integrated into development and the wider landscape. - Page 32 RV.01.3 would they be expect a 5m gap between buildings in all cases – eg on an infill site in the village centre where there is a denser form of development? This requirement has now been removed form the policy in the Neighbourhood Plan so should this be removed for consistency? - Page 32, point ii – 5m is the width of a dwelling. So are all developments in Acle to be detached? We note this distance is now not in the Plan itself, but is in the Design Guide – how are LPAs to use this 5m rule? Page 33 – a number of the different building types shown in the diagrams do not have the 5m gap between houses. - Page 33 – a number of the different building types shown in the diagrams do not have the 5m gap between houses . - Page 35, Figure 38 – in the example provided chimneys also add to the varied roofline but are not mentioned in the text. Add something about the contribution of chimney stacks to the roofline, especially in the historic parts of the village. Page 39 – is the brick wall in the bottom right corner really a poor example. On a new development, realistically the other alternative is a close-boarded fence, because the developers and new owners will want a quick means of providing a private space for a rear garden. A brick wall is far more appropriate than a 2m close-boarded fence - Throughout – you refer to the Design code for South Norfolk and Broadland at the top of some pages, but not the Design Code for the Broads Authority. - Figure 47 in the design and guidance code seems somewhat out of place - The Broads isn't particularly known for 'canal boats' - and I can't see Acle as being a outlying hub of colourful canal boats. There may only be a handful of the example 'colourful canal boats' in the Broads in total. - 47 – blue box, iii – when you say footpaths in this context, do you mean public rights of way? Or do you mean footways that run alongside roads? If footway, then isn't it a must? If footpaths, then maybe say public rights of way? - Page 52 – orange box – this needs to say that any lighting needs to be fully justified in the first place, not just street lighting. Also typo – it says 'steet'. - Page 52, blue box – why are these shoulds? These need to be musts. What is written does not really match the dark sky stance of the Neighbourhood Plan.
ANP66		Eleanor	Roberts	Senior Sustainable Development Officer	Broads Drainage Board	General				✓	<i>The following is a summary. Please see the full submission, enclosed.</i> Acle falls partially within the Internal Drainage District (IDD) of the Broads Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any development within or directly affecting the Board's area. I am pleased to note the inclusion of policy ACLE10: Flood Risk, addressing the requirement for drainage design to meet the standards set by the Lead Local Flood Authority and encouraging the use of Sustainable Drainage Systems (SuDS). I am also grateful that the presence and regulatory function of the IDB is noted. The Board also supports the inclusion of Land west of Norwich Road (adjacent to Acle Garden Machinery) and Land south of Acle Garden Machinery as Local Green Spaces. These areas are within the Broads (2006) IDB district and the Board notes their function in local drainage as well as supporting biodiversity. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy (https://www.gov.uk/guidance/flood-risk-and-coastal-change).
ANP67	Mr	Simon	Myles		Bidwells	Figure 14 - Policies Map (p.30)		✓			<i>The following is a summary. Please see the full submission, enclosed.</i> These representations have been prepared by Bidwells LLP on behalf of Repton Property Developments and Lovell Homes. Our representations are focussed on ensuring that the Neighbourhood Plan can meet the basic conditions, while ensuring site allocation B.AC.1 (a strategic policy) in the Greater Norwich Local Plan (GNLP) can be delivered. We focus on ensuring that the policies do not conflict with basic condition (2) (ea) in that they may prevent housing development allocated in the GNLP taking place. Of relevance is paragraph 44 of the PPG which reiterates a similar requirement on Neighbourhood Plans not constraining the delivery of strategic sites. Repton is a company owned by Norfolk County Council that owns the land located between Mill Lane and Norwich Road that forms approximately ⅓ of strategic residential allocation B.AC.1 in the GNLP. Repton has partnered with Lovell Homes to bring the allocated site forward for development. Repton recommend the proposals map is amended to show Greater Norwich Local Plan (GNLP) site allocation B.AC.1. This is a strategic allocation that already forms part of the development plan for the area. While there is no statutory requirement to show the allocation, it is good practice for the proposals map to show the key planning policy context. A good example is how it shows the settlement boundary from the GNLP which is directly relevant to policies in the Neighbourhood Plan. It should also show allocation B.AC.1. This will help the reader understand how the Neighbourhood Plan sits alongside the GNLP. It avoids any implication that the site is not allocated for residential development. It avoids any confusion amongst members of the public that the Neighbourhood Plan supersedes the Local Plan in this regard. It will clarify for decision makers whey applying the non-strategic policies in the Neighbourhood Plan that they were formulated in the context of the allocation. It will help the plan show how it meets the basic conditions of not preventing housing development allocated in the GNLP.
ANP68	Mr	Simon	Myles		Bidwells	ACLE7: Education and Health Provision (pp.53-54)		✓			<i>The following is a summary. Please see the full submission, enclosed.</i> Strategic policy B.AC.1 doesn't contain the requirement to allow for the colocation of the primary school and pre-school with Acle Academy. B.AC.1 was tested at the GNLP examination using a full evidence base, including education infrastructure required to accommodate the level of growth planned. This ensured it could deliver all the requirements listed out in the policy and respond to site constraints (eg new homes, link road, Acle Academy expansion, topography, flood risk, open space etc.). The site was subject to a Delivery Statement / Statement of Common Ground between Repton and the GNLP in October 2021. Preserving land for the primary school and pre-school, without a clear identified need, would risk delivery of the other strategic objectives of Policy B.AC.1. It is important to ensure that the Neighbourhood Plan does not inadvertently preclude the delivery of housing on strategic policy B.AC.1. The need to ensure development does not prevent future expansion of Acle Academy reflects strategic policy B.AC.1. In our experience policy terminology should be selected carefully as it can have unintended consequences (particularly where it is effectively reiterating an existing policy). We have, therefore, recommended the change to the second paragraph to ensure there is no chance of misinterpretation by the decision maker and to ensure it is consistent with strategic policy B.AC.1. We suggest the policy wording is amended as follows: <i>The design and layout of proposals for new housing adjacent to the Acle Academy - that is site B.AC.1 (Land west of Acle, north of Norwich Road, south of South Walsham Road) - should ensure that it does not compromise any future expansion of the academy or any future proposals involving the co-location or consolidation of Acle Academy with the primary school and the pre-school, which may be required to accommodate the planned levels of new growth.</i> <i>Development in this location should be aided by a strategic masterplan, produced through community collaboration, which guides the development of the sites in a comprehensive manner to ensure that it does not compromise any future expansion of the academy ensure the safeguarding of land for educational uses .</i>

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ANP69	Mr	Simon	Myles		Bidwells	ACLE14: Landscape and Important Public Views (p.86)		✓			Views A, B and C directly overlook housing allocation B.AC.1. The reasons for selecting the views include ‘sweeping views of large open areas’, ‘solitary and peaceful’, ‘a wide-open area with meadow flowers in the spring/summer’. This policy text in ACLE14 could act to prevent any development taking place on strategic allocation B.AC.1 by disallowing development that would ‘be to the detriment’ of the view as a whole; and requiring development to take the view into consideration and not have a significant adverse effect on it. Given the stated reasons for choosing the views, which imply that the open nature of the fields are fundamental to their value, it would be very challenging to design a development that met the policy objectives of strategic policy B.AC.1 and could comply with ACLE14. It is recommended that views A, B and C are deleted from the proposals map and Policy ACLE14. This would help ensure that Policy ACLE14 did not preclude the delivery of strategic policy B.AC.1. It would ensure that local expectations for the Neighbourhood Plan, and what the non-strategic policies can achieve, are calibrated with the strategic policy set out in the GNLP. If the views are proposed for retention we strongly recommend that the implications on strategic policy B.AC.1 and how it can accommodate them while still meeting all other evidenced policy objectives need to be explored in detail, as at present they are inconsistent. This issue with views A, B and C are an example of why it would be appropriate to include allocation B.AC.1 on the proposals map.
ANP70	Mr	Simon	Myles		Bidwells	ACLE1: The Design of New Development (p.34)		✓			Policy RV.01.04 (Building Form). Repton and Lovell have experienced technical issues integrating solar panels onto buildings that have ½ storeys as the dormer windows complicate the installation. Design Guidance and Code RV.01.02 (Settlement Edge). It is recommended that a definition be provided of ‘disproportionately high dense, urbanised layouts’. Given this is ‘Code’ and therefore a requirement, a dwelling per hectare figure should be stated to aid interpretation by the decision maker. Character Area 6 has a density of circa 25dph which is likely what would be achieved on any development at B.AC.1. Any ‘high density’ figure should not be lower than 25dph in order to be consistent with strategic policy, and the requirement to make an effective use of land in national policy. Design Guidance and Code RV.01.03 (Building Placement). It is requested that the minimum 5m gap is moved from Code to Guidance. The gap isn’t required to minimise overlooking and amenity space which can be delivered through placement of windows, boundary treatment and back gardens. As this is ‘Code’ and therefore a requirement, it must be deliverable and the spatial requirements of spacing out homes would conflict with the strategic policy B.AC.1 and making an effective use of land. There are many existing examples in Acle where buildings are closer than 5m to each other. Design Guidance and Code GV.01.03 (Biodiversity). The requirement to avoid low maintenance gardens with small quantity of landscape and planting should be removed as Code and become Guidance. Development of B.AC.1 as a whole will be required to meet Biodiversity Net Gain so will not reduce biodiversity as suggested by the policy. A mandatory requirement for biodiverse gardens for every new dwelling would add significant construction cost. The policy would also be unenforceable as individual householder gardens would not be subject to a planning condition requiring retention of planting as it would fail the test of being a ‘reasonable’ and ‘enforceable’ condition.
ANP71	Mr	Simon	Myles		Bidwells	ACLE2: New Housing in Acle (p.40)		✓			Affordable housing is a strategic policy so should remain part of the GNLP. Repton recommend the Neighbourhood Plan be limited to dealing with non-strategic matters. It shouldn’t seek to require 1/3 of units as affordable if a new GNLP reduces the affordable requirement, as that reduction will have been based on viability evidence tested through examination. As affordable housing is a strategic policy, conflicts in policy will be resolved in favour of the strategic development plan, especially if it is adopted more recently than the Neighbourhood Plan (in line with the NPPF). As such this policy is not enforceable and could lead to unrealistic expectations amongst local residents. Repton have no objection to dispersing affordable throughout the site; but this should be in clusters as registered social landlords will not want to manage individual properties dispersed throughout the site. Repton recommend that the requirement for specialist housing is limited to retirement housing rather than extra care or housing that would require more intensive on-site management. The words ‘as appropriate’ in the policy provide this flexibility. Such housing typologies are often unviable, and should only be required on very large schemes in excess of 500 units where tested through an examination process. We suggest the policy wording is amended as follows: Affordable Housing: <i>where affordable housing is to be provided, as part of a mixed development site, this should be delivered as a minimum of 1/3 of the total units on the site or in line with the relevant Adopted Local Plan policy, whichever is higher. The affordable units should be fully integrated with the open market housing and ‘pepper-potted’ in clusters around the site.</i>
ANP72	Mr	Simon	Myles		Bidwells	ACLE3: Residential Car Parking (p.43)		✓			It is recommended that this policy is amended to reflect Design Guidance and Code CV.01.2 (On-Plot Parking) to avoid parking being in front of dwellings. This will facilitate some limited frontage parking which can be landscaped effectively while allowing the delivery of small terraces of homes, which help ensure the delivery of a sustainable mixed development We suggest the policy wording is amended as follows: <i>All forms of parking areas should be designed to minimise the visual impact of the car on the street scene and the amenity of residents. Parking associated with new dwellings should be well connected, not in front of, or should avoid being in front of dwellings, should not be divorced from the dwelling, and appropriately lit to allow natural surveillance and safety.</i>
ANP73	Mr	Simon	Myles		Bidwells	ACLE9: Improving Health, Accessibility and Connectivity (pp.57-58)		✓			Repton suggest the following amendment to ensure that such infrastructure is only required if the site lies on an existing route or a revised route where a bus stop is warranted by an operator: <i>Major new development should create opportunities to encourage the use of sustainable transport through the provision of public transport infrastructure such as bus stops and shelters , <u>subject to the evidenced needs of local public transport operators.</u> Pedestrian and cycle connections should be provided, both within the site, and also linking the site to the existing network to create continuous footway links, in particular where these link to schools, public transport, community and medical facilities and recreational spaces.</i>
ANP74	Mr	Simon	Myles		Bidwells	Policy ACLE11: Light Pollution and Dark Skies (p.63)		✓			Repton have no objection to this policy in principle. It is noted that the road that links through allocation B.AC.1 may be subject to a requirement from NCC Highways to be lit. The policy should recognise this and provide this flexibility. We suggest the following amendment: <i>New street-lighting must not be located at the edge of the settlement <u>except where the Local Highway Authority require it</u> . Both residential and commercial lighting...</i>
ANP75	Mr	Simon	Myles		Bidwells	ACLE12: New and existing green spaces (pp.67-68)		✓			Flexibility should be introduced into this policy to ensure larger housing developments remain deliverable for construction site planning and phased delivery, and the new open space can be provided holistically in larger parcels instead of being subdivided into parcels for every 25 homes that are completed. We suggest the following amendment: <i>Appropriately sized informal amenity areas, play areas and natural features should be provided for major developments and should be phased <u>in line with a programme agreed under planning condition -for every 25 dwellings- constructed.</u></i>
ANP76	Mr	Simon	Myles		Bidwells	ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			Repton suggest that the 2nd, 3rd, 5th and 6th paragraphs that relates to BNG are deleted as these are a statutory requirement. The suggestion to locate off-site BNG within Acle would likely be challenging as it relies on a 3rd party registering their land as off-site BNG. Repton recommend that it is clarified if the list of green corridors in the policy is simply those mapped on Figure 31 or whether there are more or fewer than shown on that map. For example it is not apparent where “Old Track to Railway” is located. Repton recommend that it is clarified if ‘tree belts’ are the same as the tree canopies mapped on Figure 29; or if not where these are mapped. The requirement to justify loss of trees with good amenity value (and veterans or ancients) via a tree survey and arboricultural statement is inconsistent with national policy. Arboricultural assessment is only part of the considerations and any proposed loss should be balanced with achieving other planning policy objectives. For example, national policy states that the loss of veteran or ancient trees should be ‘wholly exceptional’ rather than solely on arboricultural grounds. The policy requires that: “Any access arrangements should not be at the expense of, or result in the loss of existing trees or habitats”. This is on the end of a BNG paragraph, but appears to be a general requirement. It is nearly impossible to create an access to a site without removing at least some habitat, so this policy text should be deleted as it would not be consistent with other policy objectives in the GNLP.
ANP77	Mr	Simon	Myles		Bidwells	ACLE15: Responding to Climate Change (pp.88-89)		✓			Fire Breaks - This is a very interesting and unusual policy. Repton support the flexibility in the wording of the policy. They recommend that the use of the word ‘should’ is retained in any final version. This is because while the objective of the policy is sensible, developers have no experience of how this will be incorporated into layout and detailed design. There may be alternative ways of achieving the same policy objectives.
ANP78		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Childrens Services	General				✓	There are no comments received from Children's Services. If you have any queries please contact Paul Harker (Place Planning Manager) at paul.harker@norfolk.gov.uk.

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ANP79		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Historic Environment	General				✓	Historic England’s published guidance on the preparation of Neighbourhood Plans should be consulted, please visit https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/. It encourages the full consideration of heritage assets and suggests ways with which this can be achieved. Based on this guidance, it is also suggested that the authors of the Neighbourhood Plan follow the steps indicated below: - Study Historic England’s published guidance and consider how the Neighbourhood Plan can take its advice on board. - Contact the Norfolk Historic Environment Record (NHER) and request information on designated and undesignated heritage assets within the Neighbourhood Plan area. The NHER can be contacted at heritage@norfolk.gov.uk. - Consider the full range of heritage assets within the Neighbourhood Plan area and identify those they feel are most significant. The Neighbourhood Planning group may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration. - Directly consult the Historic Environment Service's planning advice team, who can be contacted at hep@norfolk.gov.uk, they can provide advice on which heritage assets are most significant and ways in which they can be protected and enhanced. They can also offer advice on the wording of historic environment policies. Should you have any queries with the above comments please contact John Percival (Historic Environment Senior Officer) at john.percival@norfolk.gov.uk.
ANP80		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - LLFA	General		✓			<i>The following is a summary. Please see the full submission, enclosed.</i> - The LLFA welcomes that the Draft modified Acle Neighbourhood Plan 2025 - 2040 and its proposed policies retain references to the need for developments to consider and mitigate against flood risk from various sources including surface water and fluvial flooding, whilst also giving consideration to sustainability and the implications of climate change. Policy ACLE1: The Design of New Development (modified), Policy ACLE8: Cemetery Provision (new), Policy ACLE10: Flood Risk (new), Policy ACLE12: New and Existing Green Spaces (new), Policy ACLE13: Biodiversity and Ecological Corridors (new) and Policy ACLE15: Responding to Climate Change (new) and their supporting text and Objective 5: Natural Environment, are identified as being of the most relevance to matters for consideration by the LLFA. - We particularly welcome the retention and enhancement of new policies within the Neighbourhood Plan, in particular Policy ACLE10: Flood Risk and Policy ACLE15: Responding to Climate Change which relate to the need for new developments to consider and mitigate against all sources of flood risk such as surface water, promote the use and wider benefits of the inclusion of Sustainable Drainage Systems (SuDS) within developments, along with highlighting the implications of climate change on flood risk. We also welcome further references made to these matters within other policies such as Policy ACLE1 and the consideration of groundwater and contamination in Policy ACLE8. - We also welcome references retained in the document to the need for developments to take into account guidance from organisations such as NCC LLFA, Environment Agency and Internal Drainage Boards relating to flood risk including references made in the document to 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document within the Neighbourhood Plan (the most 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. - We welcome references complimenting Strategic Policies including those within the Greater Norwich Local Plan (GNLP), Broadland Development Management Plan Document 2015, The Broads Local Plan 2019, Norfolk Minerals and Waste Local Plan 2025 and the National Planning Policy Framework (NPPF). - The LLFA are not aware of AW DG5 records within the Parish of Acle, however, this will need to be confirmed with/by Anglian Water. - According to LLFA datasets (extending from 2011 to present day) we have 15 no. records of internal flooding and 18 no. records of external/anecdotal flooding in the Parish of Acle. 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. - We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports here. - According to Environment Agency datasets, there are areas of localised surface water flooding (ponding), as well as surface water flowpaths present within the Parish of Acle. - Our records also indicate ordinary watercourses present within the Parish of Acle which fall within the Broads Internal Drainage Board area, along with an EA main River the east. It is also noted that the whilst the majority of the parish lies within Flood Zone 1, an area to the east falls within Flood Zones 2 and 3. - The LLFA welcome that flood risk mapping (Figures 21 and 22) has been included in the neighbourhood plan document. The LLFA recommend that mapping be provided for all sources of flooding, with any mapping covering the entirety of the Neighbourhood Plan Area.
ANP81		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Minerals & Waste	General				✓	The Minerals and Waste Team has no comments to make on the Reg 16 review of the Acle Neighbourhood Plan. Should you have any queries with the above comments please contact Caroline Jeffery (Principal Planner, Minerals and Waste Policy) at caroline.jeffery@norfolk.gov.uk.
ANP82		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Public Health	General				✓	you for consulting Norfolk County Council (NCC) Public Health regarding the Neighbourhood Plan for Acle. NCC Public Health have no specific comments regarding the Plan. However, if they have not already done so, they may find it helpful to consult the Health in Neighbourhood Plans guidance , which supports communities to embed health in their plans and includes examples of good practice. If they have any specific questions regarding this, they are welcome to contact us at phplanning@norfolk.gov.uk.
ANP83		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Natural Environment	ACLE11: Light Pollution and Dark Skies (p.63) and ACLE13: Biodiversity and Ecological Corridors (pp.75-76)	✓				We welcome the inclusion of Policy ACLE11: Light Pollution and Dark Skies, and Policy ACLE13: Biodiversity and Ecological Corridors, as well as reference to BNG. Should you have any queries with the above comments please contact the Natural Environment Team at neti@norfolk.gov.uk.
ANP84		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - LLFA	ACLE12: New and existing green spaces (pp.67-68)				✓	The document proposes 23 no. Local Green Spaces which are identified in Policy ACLE12: New and Existing Green Spaces and Figure 24. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. 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. Should you have any queries with the above comments please contact the Lead Local Flood Authority at lifa@norfolk.gov.uk.
ANP85		Sally	Minns	Principal Strategic Policy Planner	Norfolk County Council - Transport	Policy ACLE 12 – New and Existing Green Spaces (p.67)		✓			This Neighbourhood plan, possibly inadvertently, is seeking to designate dedicated highway as Local Green Spaces. The concern of the Highway Authority is that should there be a need to undertake (permitted development) highway works that affect the verges included in these designated areas, there may be local opposition to such works from the perceived damage to a protected green space, even though these works are undertaken by (or on behalf of) the Highway Authority to ultimately benefit the local community. Highway verges are effectively part of the highway land where the road or footway is adopted highway as defined through Highways legislation. This should not be adopted as open space as it is for all intents and purposes functional highway land for maintenance purposes for the adopted road or footway or surface water drainage associated with the adopted highway. However, where a road/footway is not adopted, it may be possible with the consent of the landowner/s. National guidance (paragraph 104 of the NPPF) states that the space must be capable of enduring beyond the plan period. Land adjoining an existing highway is subject to ‘Permitted Development’ rights, which could be used to bring forward development that is in direct contradiction to the designation of a Local Green Space, but would not require planning permission to be granted. Highway land may also be utilised in bringing forward future highway/transport schemes, as well as active travel measures to encourage walking and cycling, such as cycle lanes or footways. Therefore, highway land/roadside verges would not typically be suitable for designation. It is considered that highway verges do not typically meet the criteria of paragraph 107 of the NPPF of being “demonstrably special” or of “particular local significance” and therefore are not suitable to be designated as Local Green Spaces. The Highway Authority objects to the Green Space designation where it is proposed within the highway boundary. The remedy to this is to redefine the boundaries of the Local Green Space designations as shown on Figure 24 to exclude public highway and to include more detailed plans of each of the proposed Green Space areas at a scale capable of being able to confirm the boundary of each area and that it does not extend into the public highway or conflict with the powers and functions of the Highway Authority. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at richard.doleman@norfolk.gov.uk.

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ANP86	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE7 (pp.53-54), ACLE10 (p.61) and Implementation and Monitoring (pp.98-99): fire and rescue infrastructure contributions		✓			NFRS recommends that where the Plan refers to infrastructure requirements, community infrastructure, health, education, developer mitigation, planning obligations or Community Infrastructure Levy priorities, emergency service infrastructure should also be recognised as a relevant infrastructure consideration. Major development may be required to contribute to fire and rescue infrastructure where necessary to make the development acceptable in planning terms. This may include, where justified and meeting the legal tests as set out in the Community Infrastructure Levy (CIL) Regulations 2010, contributions towards fire service vehicles, equipment, facilities and response provision through s106 agreements or other appropriate planning mechanisms. New development can create increased incident demand, alter the local risk profile and affect response standards. Policy/guidance basis: Fire and Rescue Services Act 2004; Fire and Rescue National Framework for England; NFRS Community Risk Management Plan requirements; Community Infrastructure Levy Regulations 2010, Regulation 122.
ANP87	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE1 (pp.34-36), ACLE3 (pp.43-44), ACLE9 (pp.57-58)and ACLE15 (pp.88-89): fire appliance access		✓			NFRS supports the inclusion of fire prevention, emergency vehicle access and traffic-calming considerations within Policy ACLE1, Policy ACLE3, Policy ACLE9 and Policy ACLE15. These policies should continue to make clear that development layouts, access roads, turning facilities, gateways, traffic calming, parking arrangements, street trees, verges, bollards, gates, active travel routes and shared surfaces must enable safe and effective access by fire appliances to all relevant parts of a development. This should be considered at design stage and maintained throughout the life of the development. Where residential properties are located more than 45 metres from the closest fire appliance access point, measured to the furthest point of the floorplan, BS 9991 indicates that domestic sprinkler systems should be provided in accordance with BS 9251. This allows a maximum access distance of 90 metres to the furthest point of the floorplan for dwellinghouses where no floor is more than 4.5 metres above ground level. This distance is reduced to 75 metres where any floor is more than 4.5 metres above ground level. NFRS expects developers either to adhere to these access distances or to demonstrate comparable occupant safety where an alternative approach is proposed. Policy/guidance basis: Building Regulations 2010, Approved Document B, Volume 1 and Volume 2, Requirement B5: Access and facilities for the fire service; BS 9991:2024; BS 9251.
ANP88	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE1 (pp.34-36), ACLE10 (p.61) and ACLE15 (pp.88-89): firefighting water supplies and hydrants		✓			NFRS supports the existing reference in Policy ACLE1 to appropriate provision for fire hydrants. The Plan should retain and, where possible, strengthen references to firefighting water supplies in policies and supporting text that address design, sustainable drainage, major development, community facilities, business and tourism uses. Developers are expected to make adequate provision for fire hydrants and/or alternative firefighting water supplies to protect the development and support operational firefighting activity. This is particularly relevant where development incorporates new roads, larger residential sites, community facilities, business premises, visitor accommodation or locations where access to existing hydrants may be limited. Policy/guidance basis: Fire and Rescue Services Act 2004; Building Regulations 2010, Approved Document B, Requirement B5; Water Industry Act 1991, Section 57, which provides for fire hydrants required for firefighting purposes to be fixed on water mains.
ANP89	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE1 (pp.34-36): refuse and recycling storage		✓			NFRS supports the wording in Policy ACLE1 which states that any purpose-built structure to house communal refuse or recycling bins should not be located immediately adjacent to dwellings. This should be retained and applied to residential developments, higher-density schemes, flats, community facilities, mixed-use premises and visitor accommodation. Refuse and recycling storage should be located and designed so that a fire involving bins would not spread to buildings, compromise escape routes or obstruct fire service access. Policy/guidance basis: Building Regulations 2010, Approved Document B, Requirements B1 to B5; general fire safety principles for means of escape, external fire spread and access/facilities for the fire service.
ANP90	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE3 (pp.43-44) and ACLE15 (pp.88-89): renewable energy, battery storage and EV charging		✓			NFRS supports the Plan's approach to climate change mitigation, energy efficiency, low-carbon infrastructure, renewable energy and electric vehicle charging. Policy ACLE3 refers to electric charging facilities within parking design and Policy ACLE15 promotes renewable and low-carbon energy infrastructure. The supporting text or policy wording should recognise that photovoltaic panels, domestic electrical energy storage systems, battery energy storage systems and electric vehicle charging points can introduce specific fire safety considerations. Developers should engage with NFRS at an early stage where proposals include battery energy storage, extensive PV arrays, EV charging infrastructure or higher-risk renewable energy technologies, particularly in community buildings, car parks, business premises, tourism facilities and residential developments. Policy/guidance basis: PAS 63100:2024, Electrical installations – Protection against fire of battery energy storage systems for use in dwellings – Specification; IET Code of Practice for Electric Vehicle Charging Equipment Installation; Building Regulations 2010, Approved Document B.
ANP91	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE4 (p.47), ACLE5 (p.49), ACLE6 (pp.51-52), ACLE7 (pp.53-54) and ACLE9 (pp.57-58): community, business, employment, tourism and visitor access		✓			Where proposals provide or expand village centre uses, mixed uses, business premises, tourism facilities, Acle Bridge improvements, education, health, community facilities or active travel routes, the relevant policies should ensure that emergency access, turning areas, parking management and firefighting water supplies are considered from the outset. This is particularly relevant to Acle Bridge and other locations where constrained access, visitor parking, narrow lanes, waterways, seasonal activity or increased footfall may affect operational response. Proposals should also ensure that traffic calming, pedestrian priority measures, cycle infrastructure, bollards, gates and access controls do not prevent or delay fire appliance access. Policy/guidance basis: Building Regulations 2010, Approved Document B, Requirement B5; Fire and Rescue Services Act 2004; Fire and Rescue National Framework for England.
ANP92	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE10 (p.61) and ACLE15 (pp.88-89): Sustainable Drainage Systems, fire breaks and operational access		✓			NFRS supports the Plan's inclusion of Sustainable Drainage Systems and fire break considerations. Where SuDS, basins, swales, wetland features, ponds, drainage lagoons or flood mitigation infrastructure are proposed, layouts should ensure that these features do not compromise emergency access routes, appliance hard standings, turning areas or hydrant access. Where features are fenced or gated for safety, arrangements should ensure operational access can be obtained if required. Fire breaks between residential or commercial development and agricultural land should be designed so that they reduce wildfire spread risk without preventing emergency access or creating unmanaged areas that may introduce additional operational hazards. Policy/guidance basis: Building Regulations 2010, Approved Document B, Requirement B5; Fire and Rescue Services Act 2004.
ANP93	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	ACLE2 (pp.40-41) and ACLE7 (pp.53-54): enhanced provision for older people, specialist accommodation and housing mix		✓			NFRS supports the recognition within Policy ACLE2 of specialist housing, adaptable homes, bungalows, ground floor flats and housing that meets the needs of older people, people with disabilities or limited mobility. Where specialist housing, supported living, residential care or housing with care is proposed, fire safety, evacuation strategy, water supplies, appliance access and access to fire service facilities should be considered early, given the potential vulnerability of occupants and the operational complexity that may arise at such premises. Where health and community facilities are expanded under Policy ACLE7, similar early consideration should be given to evacuation, access and water supplies. Policy/guidance basis: Building Regulations 2010, Approved Document B; Fire and Rescue National Framework for England; Fire Safety Order considerations where premises fall within scope after occupation.
ANP94	Mr	Clive	Denniss	Operational Risk and Policy	Norfolk Fire and Rescue Service	Policy ACLE1, Policy ACLE3, Policy ACLE9, Policy ACLE10, Policy ACLE15 and the Implementation and Monitoring section		✓			NFRS recommends that the following wording is included within the relevant policy/policies and/or supporting text, particularly Policy ACLE1, Policy ACLE3, Policy ACLE9, Policy ACLE10, Policy ACLE15 and the Implementation and Monitoring section: "Development proposals must demonstrate that appropriate provision has been made for emergency vehicle access, fire appliance turning facilities, firefighting water supplies, including hydrants where required, and safe operational access throughout the development. Where development would create additional demand for fire and rescue services, or where site-specific risks require mitigation, developer contributions towards fire and rescue infrastructure, vehicles, equipment, facilities or response provision may be sought where necessary, directly related to the development, and fairly and reasonably related in scale and kind in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010. Proposals involving photovoltaic arrays, electrical energy storage systems, battery energy storage systems or electric vehicle charging infrastructure should demonstrate that fire safety risks have been considered at design stage and that relevant national standards and guidance have been followed."
ANP95		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE1: The Design of New Development (p.34)	✓				Anglian Water supports the design code theme GV.01.2 Blue and green network which has multi-functional benefits, including to help minimise flood risk. We support the use of permeable paving materials to reduce surface water run-off. It is important to note that permeable paving should not be installed over our underground assets such as sewers and water mains, as access for maintenance and repair could be restricted and where such activities are carried out it could affect the performance of the SuDS/permeable paving. We welcome reference (GV002 to sustainable drainage systems (SuDS) and note that this is addressed in further detail by Policy ACLE10.
ANP96		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE3: Residential Car Parking (p.43)		✓			We recommend that the policy should encourage the use of permeable paving materials for the creation of new parking areas to reduce surface water run-off.
ANP97		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE10: Flood Risk (p.61)		✓			Anglian Water is supportive of the policy in principle. As Anglian Water is responsible for sewerage and drainage and is also identified as a Risk Management Authority in respect of flooding, we would request that Anglian Water is also included in the list of relevant stakeholders referenced in the third paragraph - so that surface water risk management advice and guidance is also sought from Anglian Water. We support the reference to considering the potential flood risk from all sources including surface water and groundwater. Anglian Water welcomes the policy requirement for all new development to use SuDS. We suggest that opportunities could include the potential for non-potable reuse (e.g. rainwater harvesting systems) to be utilised with SuDS attenuation features.

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ANP98		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE12: New and existing green spaces (pp.67-68)		✓			Anglian Water has a number of underground assets (sewers and water mains) within some of the proposed areas for Local Green Space (LGS). It is not considered that the policy would prevent the repair or maintenance of these assets. However, there are two proposed LGS where we have identified our pumping stations within the boundary. We request that these are omitted from the LGS designation, as the policy may impact our ability to upgrade these if required in the future. For LGS 23 this pumping station appears to be on the edge of the LGS and may be simply omitted from the boundary, this may also be possible for our pumping station (and land in our ownership) within LGS 21 Damgate Woods. Both LGS 21 and 23 areas are within The Broads Executive Area and therefore they have a status of protection under The Broads statutory purposes as prescribed by the 1949 National Parks and Access to the Countryside Act. If these proposed areas of local green space are taken forward into the final plan, and our assets are not removed from the proposed LGS boundaries, we request that the policy is amended to include reference to already present utility infrastructure that could require future upgrades: "These Local Green Spaces will receive special protection in accordance with national policy. Exceptions will be made where development proposals relate to improvements to existing infrastructure." LGS 21: ACLE-REEDHAM RD NO 1 Pumping Station is located within this space. LGS 23: NORWICH 27 OLD MARKET CLOSE Pumping Station possibly on the edge boundary of the LGS.
ANP99		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			Anglian Water is supportive of the policy requirements that are consistent with the Local Nature Recovery Strategy for Norfolk. We note that planting plans for new hedges and trees are required to have regard to a number of factors to ensure the right tree is in the right place. We request that this section of the policy is amended to also take account of easements for underground utilities such as water mains and sewers.
ANP100		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	ACLE15: Responding to Climate Change (pp.88-89)		✓			Anglian Water is supportive of the approach taken to enhance climate resilience through sustainable design and other policy measures such as reducing the risk of flooding. We support reference to water management measures, but we would request that the policy text is clearer to define these opportunities. "integrated water management measures including water efficient fixtures and fittings and water reuse (rainwater harvesting or greywater recycling systems)." We would also request that Anglian Water's environmental incentives are referenced in the supporting text as these provide positive benefits for developers connecting to our public water supply. Further information can be found on our website. Tier 1 is for installing fixtures and fittings to meet 90 l/p/d and Tier 2 for installing rainwater harvesting or greywater recycling systems. The Shared Standards for Water Efficiency in Local Plans (published in June 2025) sets out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards (up to 85 litres per person per day – l/p/d) in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. It is considered that there is clear evidence to support tighter water efficiency standards for new development in the neighbourhood plan, and incentives available to enable this to be achieved.
ANP101		Sally	Wintle	Consultations Team	Natural England	General				✓	<i>The following is a summary. Please see the full submission, enclosed.</i> Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species . Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.
ANP102	Mr	David	Yates	Norfolk and Suffolk Area Team	Natural England	ACLE10: Flood Risk (p.61)	✓				I strongly welcome the inclusion of the new Environment objective. The fact that this was not part of the current adopted neighbourhood plan for Acle is a significant omission, which I am very pleased to see will now be rectified. I welcome Policy ACLE10, especially the requirement for new developments to use sustainable drainage methods which provide wider amenity, recreational and biodiversity benefits and are integrated into the landscape.
ANP103	Mr	David	Yates	Norfolk and Suffolk Area Team	Natural England	Policy ACLE11: Light Pollution and Dark Skies (p.63)	✓				I particularly welcome the clause about reducing or mitigating the disturbance to nocturnal wildlife through lighting and demonstrating compliance with best practice guidance.
ANP104	Mr	David	Yates	Norfolk and Suffolk Area Team	Natural England	ACLE12: New and existing green spaces (pp.67-68)	✓				I particularly welcome the reference to development proposals enhancing access to green spaces and trackways through the provision of signage and seating to support social prescribing and the mental well-being of residents.
ANP105	Mr	David	Yates	Norfolk and Suffolk Area Team	Natural England	ACLE13: Biodiversity and Ecological Corridors (pp.75-76)		✓			The identification of existing green corridors through a list in the policy and a map of green corridors in the accompanying text is welcome, but I would like to see the sentence that commences 'Priorities for Biodiversity Net Gain and enhance enhancement within the parish....' should be extended in order to include linking ecological corridors within the parish to ecological corridors beyond the parish boundary in order to help to develop a nature recovery network for Norfolk. Opportunities for doing this can be identified by reference to the Norfolk Local Nature Recovery Strategy Local Habitats Map. I support the use of the Local Nature Recovery Strategy to identify preferred locations for habitat creation for off-site biodiversity net gain. However, I would like to see reference to the fact that the 'potential measures' layer of the Norfolk LNRS Local Habitats map shows which would be the best habitats to create in any particular location. Just directing people to use the 'Areas that Could Become of Particular Importance for Biodiversity' mapping layer risks them creating an inappropriate habitat for that particular location and still complying with the Neighbourhood Plan. Another change that I would suggest is made would be to change the sentence 'Off-site biodiversity enhancements should be directed to areas identified in any Local Nature Recovery Strategy within the parish' to 'Off-site biodiversity enhancements should be directed to areas identified in the potential measures layer of the Norfolk Local Nature Recovery Strategy Local Habitats Map'. The current wording suggests that there is more than one Local Nature Recovery Strategy that could be used. Only the one published in 2025 by Norfolk County Council should be used in order to meet the 'take account' duty placed on planning authorities. I am happy to see the inclusion of the paragraph on incorporating measures for wildlife into new built development.

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ANP106				Estates and Sustainability Team	NHS Norfolk & Suffolk ICB	General		✓			<i>The following is a summary. Please see the full submission, enclosed.</i> It is encouraging to see the additional wording "create healthy and safe places" and be "community focused" in the updated vision, which originally simply referred to sustainable, well-designed and environmentally conscious development. This is positive as health is embedded within the overarching vision and it also aligns with the NPPF healthy place's objective. <u>Changes that Affect Wider Determinants of Health</u> Through the neighbourhood plan, there have been several changes which strengthen wider determinants of health. These include additional requirements to green infrastructure as proposed by the ICBs original response to Reg 14, which include enhanced access to green space, providing seating and clear signage, supporting social prescribing and support for mental wellbeing. The ICB supports these strong health improvements within the plan as they align closely with preventative health, physical activity, mental wellbeing and reducing social isolation. There are further improvements to the wider determinants of health through Connectivity, Active Travel and Environmental policies also. There are enhanced design code references related to active travel, pedestrian connectivity, legibility, wayfinding and cycle access. These will help to support reduced car dependency and encourage walking and cycling. <u>Key Healthcare Gaps to Address</u> The submission version of the Acle Neighbourhood Plan is more health-positive than the pre-submission version, with stronger references to wellbeing, healthy communities, accessibility and active lifestyles. However, a number of important gaps remain in relation to healthcare. There is no recognition of healthcare infrastructure requirements, there is no policy for healthcare developer contributions or a requirement to assess healthcare impacts... • The Plan does not identify healthcare infrastructure as critical infrastructure required to support planned population growth. • There is no acknowledgement of existing capacity pressures within local primary care services • The Plan would benefit from explicit recognition that housing growth generates demand for GP, community health and other healthcare services • There is no policy requiring healthcare infrastructure to be considered when securing developer contributions. • Healthcare is not specifically referenced within infrastructure funding priorities. • The Plan does not support the use of Section 106 or Community Infrastructure Levy (CIL) funding towards healthcare infrastructure where impacts can be demonstrated • There is no requirement for Health Impact Assessments or equivalent assessments of healthcare demand generated by new development. • Policy ACLE7 supports proposals for healthcare facilities and expansions if they come forward. However, it does not require healthcare capacity to be planned alongside housing growth. The Plan should also support early engagement with the ICB and relevant NHS partners during plan-making and development management processes, so that healthcare capacity, accessibility and mitigation requirements can be considered alongside housing growth. Subject to these points being addressed, the ICB considers that the Plan provides a positive basis for supporting healthier communities in Acle, while ensuring that future growth is planned in a way that is sustainable, accessible and appropriately supported by healthcare infrastructure.
ANP107				Estates and Sustainability Team	NHS Norfolk & Suffolk ICB	ACLE1: The Design of New Development (p.34)	✓				Additional wording has been included in this policy which requires developments to... • Create safe inclusive and accessible places • Promote health and wellbeing • Support community cohesion These additions are supported by the ICB as they will strengthen design principles, support accessible neighbourhoods and inclusive environments.
ANP108				Estates and Sustainability Team	NHS Norfolk & Suffolk ICB	ACLE2: New Housing in Acle (p.40)	✓				This is one of nine new policies in the plan. Pre-submission the policy required adaptable housing, accessible homes and bungalows which is again supported by the ICB, however this new policy strengthens the healthcare related requirements by including... • that specialist housing must demonstrate proximity and safe access to Primary care and pharmacy services • provide on-site features to support independence and prevention These improvements in healthcare planning means that healthcare accessibility becomes a material planning consideration, it also strengthens the link between housing growth and local health services, embeds preventative health measures and also supports the argument regarding capacity pressures at local GP practices.
ANP109				Estates and Sustainability Team	NHS Norfolk & Suffolk ICB	ACLE7: Education and Health Provision (pp.53-54)				✓	This policy is a merger of the previous policies 3 & 4. However, it remains largely unchanged from the pre-submission version and continues to support expansion of healthcare facilities, shared community spaces and accessible locations, however further wording in the latest draft references growth related infrastructure planning which is positive providing the ICB are consulted at an early stage of plan making, such as local plans to enable feedback on potential housing sites in relation to healthcare infrastructure status and the wider determinants of health.