

Dickleburgh & Rushall Neighbourhood Plan - Reg. 16 Representations Summary

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-01				Planning Technical Team	Sport England	General				✓	<p><i>The following is a summary. Please see submission for full response.</i></p> <p>Positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important, as referenced within the NPPF. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land.</p> <p>A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p>
DR-02	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	Environmental and biodiversity objectives	✓				<p>We support the environmental and biodiversity objectives which are listed on page 17.</p> <p>We are particularly encouraged by the wording in objective 4, ‘....supporting creative thinking and solutions that safeguard and enhance the natural environment. To promote, within the design/build of new developments, features such as permeable driveways/hard standing, provision of green energy, green walls, green roofing...’</p>
DR-03	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR6: Heritage ditches, hedges and verges	✓				<p>We support this policy which aims to enhance the network of ditches, hedges and verges within the parish, and the recognition that these are important for their biodiversity value. We have commented on Roadside Nature Reserves (RNRs), which form part of the network of verges, in Policy DR17.</p>
DR-04	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR11: Water harvesting	✓				<p>The design of new developments should optimise the inclusion of water efficiency and consumption measures, such as rainwater/ or greywater recycling, low flow taps and showers, low flush toilets and Sustainable Urban Drainage Systems (SUDS) in the construction of new buildings. We therefore support this policy including the ambitious water efficiency standards. We also welcome the supporting wording to this policy which explains in detail why this is important.</p>
DR-05	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR12: Flooding and surface water drainage issues		✓			<p>Sustainable Urban Drainage Systems (SuDS) are extremely important in reducing flood risk, reducing pollution locally, increasing biodiversity and when used effectively can provide habitat connectivity. We therefore support this policy and particularly the wording around SuDS, which includes the four pillars of SuDS. We particularly welcome the wording in the last two paragraphs. We also advocate the addition of green roofs/walls to buildings, particularly community buildings, as they provide many benefits: increasing biodiversity, reducing run-off, improving air quality and improving thermal performance by providing shading and insulation which contributes to greater energy efficiency. As green walls and green roofs are also promoted in objective 4 and mentioned in supporting text, we recommend that there is some policy wording (either within this policy or another) to include green walls/roofs, for example: <i>‘The addition of green roofs and/or green walls to buildings should be encouraged where possible and appropriate, particularly for any new community buildings.’</i></p>
DR-06	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR14: Carbon offsetting for new builds	✓				<p>Climate change is one of the most significant and fastest growing threats to society. Due to the climate emergency and the need for an emphasis on the importance of designing for net zero, we support the measures included in this policy.</p>
DR-07	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR16: Walking, cycling and horse riding	✓				<p>We advocate the provision and enhancement of a network of green walking and cycling routes which will help to reduce carbon emissions, support nature’s recovery, increase biodiversity, provide habitats for wildlife and improve habitat connectivity, whilst also providing health benefits for people. We therefore welcome this policy.</p>

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DR-08	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR17: Green corridors and Biodiversity Net Gain		✓			<p><i>The following is a summary. Please see submission for full response.</i></p> <p>We strongly recommend that policy wording also includes County Wildlife Sites, Nature Reserves, Roadside Nature Reserves and Priority Habitats, to ensure robust protection for these valuable habitats and sites, for example: <i>'Proposals for new development will be expected to retain, protect and enhance existing green corridors within the parish. The County Wildlife Sites, Priority Habitats, Roadside Nature Reserves and any Nature Reserves should also be protected and retained and opportunities sought for enhancement.'</i></p> <p>We recommend including a list of all the natural environmental assets within the Neighbourhood Plan boundary. This may naturally sit within S7.1 and includes the following:</p> <p>There are 7 County Wildlife Sites (CWS): Dickleburgh Moor CWS (& wetland nature reserve); Langmere Green CWS; St. Clement's Common CWS; Whitepost Lane Wood CWS; Furze Covert CWS; Hall Farm Pond CWS; Oliver's & Dodd's Woods CWS (& Ancient Woodland)</p> <p>The following Priority Habitats are also included within the NP boundary: Ancient Woodland, Deciduous Woodland and Traditional Orchards.</p> <p>Roadside Nature Reserves (RNRs) are important for scarce and unusual plants and they also act as wildlife corridors for many species, proving invaluable for nature recovery. There are 2 Roadside Nature Reserves (RNRs):</p> <p>RNR on Harvey Lane (number 212) which contains pepper saxifrage, musk mallow and yellow oat grass.</p> <p>RNR on Hall Lane (number 218) which contains sulphur clover, a Nationally Scarce plant.</p> <p>Given the pressures facing biodiversity, The Wildlife Trusts recommend an ambition of 20% Biodiversity Net Gain should be encouraged to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature.</p> <p>Although we support this policy, we recommend policy wording to advise at least 10% BNG but an aspiration for new development to deliver 20% biodiversity net gain which would align especially with the environmental objectives of the plan. (However, we recognise that it may not be possible to add this at Reg. 16.)</p> <p>Regarding Biodiversity Net Gain, created or enhanced habitats must be maintained for a minimum of 30 years. (The 3rd paragraph advises 10 years.)</p>
DR-09	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR18: Local Green Spaces	✓				We support the 8 designated Local Green Spaces as they provide habitats for wildlife and act as natural wildlife corridors.
DR-10	Ms.	Julie	Cullis	Assistant Adviser, Planning & Advocacy	Norfolk Wildlife Trust	POLICY DR19: Dark Skies	✓				Due to the known adverse impacts on nocturnal wildlife from light pollution, we support this policy on Dark Skies and particularly that 'Lighting likely to cause disturbance or risk to wildlife should not be supported.'
DR-11	Ms.	Eleanor	Roberts	Senior Sustainable Development Officer	Water Management Alliance	Policy DR20: Allocation				✓	<p><i>The following is a summary. Please see submission for full response.</i></p> <p>The IDB would seek to comment on this development should it come forward for planning permission, alongside an explanation of any potentially required consents. The site location shown in figure 66 is outside the IDD of WLYLIDB, however it is adjacent to a riparian watercourse which connects directly into the IDD. If this development comes forward for planning permission, please be aware that the Board may require an application for consent under Byelaw 3 if the applicant intends to discharge surface water or treated foul water to this watercourse. The Board welcomes pre-application consultation and would be happy to discuss drainage proposals at an early stage of development.</p> <p>As the aforementioned watercourse is not within the Board's IDD, the regulation of the watercourse adjacent to the site boundary is the responsibility of the Norfolk County Council Lead Local Flood Authority. Please be aware that if any alteration of this watercourse is proposed, consent will be required under Section 23 of the Land Drainage Act 1991 from the LLFA.</p>
DR-12				Planning	South Norfolk Council	General		✓			<p>As will be seen from specific comments, below, most policy chapters of the document copy whole sections from the NPPF. In general, we feel that the Plan should not duplicate national policy, and that these sections should be significantly condensed by simply including a brief description of the matter and a reference to the relevant NPPF paragraph.</p> <p>The Council also considers it necessary to include some wording in the Introduction that sets out the relationship between the Neighbourhood Plan and the adopted and emerging Local Plans for the area (i.e. the GNLP and the South Norfolk Village Clusters Housing Allocations Plan).</p>
DR-13				Planning	South Norfolk Council	Section 1. Introduction		✓			Given that Dickleburgh Moor is obviously a key focus for the Neighbourhood Plan, it would be helpful to show its extent on a map.
DR-14				Planning	South Norfolk Council	Paras. 4.1 & 4.2			✓		Elements of these paragraphs appear to be setting policy requirements (e.g. 'Any development will be required to reflect the best of the parish in terms of architecture, ecology, natural habitats and biodiversity.') Policy statements, which will form part of the Development Plan for the purposes of decision making can only be made within the Policies of the Neighbourhood Plan itself. Whilst supporting justification can, in certain circumstances, provide a useful explanation of the intention and intended interpretation of a policy this cannot go beyond the extent of the policy in the plan itself.

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DR-15				Planning	South Norfolk Council	4. Heritage Policies		✓			<p>Para 4.5 - stating 'it is crucial that all NDHAs are protected within their setting' is somewhat misleading and is not the correct legal wording as there is no legislation or policy that states that the setting is 'protected'. NPPF paragraph 216 states, 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.' Therefore it is more a case of having regard to the significance of the asset when determining an application and how it is affected in terms of harm or loss.</p> <p>Para 4.6 – this analogy is slightly unclear. It should be the tower that is considered to be the heritage asset, not the house. To be a NDHA, PPG states that an asset should have a degree of heritage significance meriting consideration in planning decisions, and criteria are set out in para 4.7.</p> <p>Para 4.12 - it is confusing that this section relates to heritage but quotes sections of the NPPF dealing with conserving and protecting the natural environment (para 180). It may well be that the moor has heritage value in how humans interacted with the landscape but, in that case, it should be considered a heritage asset.</p> <p>The identification of the Historic Core is confusing it does not appear from the supporting text that the intention is for this to be a heritage designation, more of a 'natural area' designation. References to 'Green Belt' (paras. 4.17-4.19) and Local Green Space further complicate the picture (Green Belt designation is a matter for strategic policy [NPPF para. 144] and it should only be established in exceptional circumstances). It would be clearer if there were a concise definition of what constitutes the historic core and why it has been given that definition. It is not a normal reference term for a heritage asset. It would also be clearer if natural environment matters were kept separate from those relating to heritage, as they are in the NPPF.</p> <p>Paras. 4.12-4.19 (and others throughout the document) copy whole sections from the NPPF. We consider this could be significantly condensed by simply including a brief description of the matter and a reference to the relevant NPPF paragraph.</p> <p>It is felt that the penultimate paragraph on page 30 should clarify that NDHA status cannot automatically be designated and that any review of NDHAs within the parish should take place as part of any future Neighbourhood Plan review and update.</p>
DR-16				Planning	South Norfolk Council	Policy DR1: Heritage		✓			<p>The 'historic core' has effectively been defined as the entirety of Dickleburgh village and its immediate surroundings, including Dickleburgh Moor, to the north. The historically sensitive area of the settlement has already been designated by South Norfolk Council as a Conservation Area (the last appraisal was in 2017). It is difficult to see how the much larger area proposed is justified as qualifying for the considerations set out in DR1. Imposing blanket requirements on such a large area, with a lack of robust justification, arguably contravenes the NPPF in terms of plans contributing to the achievement of sustainable development and being prepared positively. In addition, 'historic core' is not a designation that is used elsewhere in national planning legislation or local planning policy, making it difficult to support.</p>
DR-17				Planning	South Norfolk Council	Para. 4.31		✓			<p>The East of England Plan (2008) is an obsolete document and should not be referenced.</p>
DR-18				Planning	South Norfolk Council	Policy DR3: Views and vistas	✓				<p>This is a positively worded policy which highlights particular considerations that are unique and special to the Neighbourhood Plan Area. The Council welcomes the inclusion of maps and photographs to give perspective on the important views and vistas.</p>
DR-19				Planning	South Norfolk Council	Policy DR4: Settlement gaps			✓		<p>The Council notes that the boundaries of the proposed settlement gaps have been re-drawn to address comments made by the local planning authority during the Reg. 14 consultation. In addition, gap B in particular has been significantly reduced. However, the Council still has concerns regarding this policy –</p> <p>Neighbourhood Plan policies are required to be written positively to ensure that development that takes place in a designated area is appropriate. They should not be used to simply stop development from taking place. The criteria in this policy do not provide clarity on situations where development within the Settlement Gaps would be appropriate. It is not clear how it can be shown how the Gaps can be maintained and 'not compromised' by any form of development regardless of scale. As written, it is difficult to see any circumstance where development would be able to meet all of these criteria or where they could be applied consistently.</p> <p>The Council has concerns over the extent of the identified gaps and whether the evidence is adequate to justify such large areas of land being defined (particularly as regards gap A). In particular, the stated purpose of the settlement gap is to “preserve the integrity of the settlement and maintain the nucleated villages and hamlets in the parish”. It is hard to understand how some further development immediately on the northern or eastern edges within the area identified would meaningfully result in the coalescence or merging of Dickleburgh with either Dickleburgh Moor or Rushall. The Council is concerned that as defined the extent of the settlement gap is not justified and may unduly constraint the achievement of sustainable development.</p> <p>In regard to the policy text itself, for bullet point (a) (2nd paragraph), consideration would also need to be given as to whether alternative sites are available, suitable and can be viably developed for the development proposed.</p> <p>Point b) is also ambiguous. It is not clear what is meant by “the settlement gap will not be compromised”. Is it intended to mean that in practical terms no development would be allowed. If this is the case then it would be a very high level of protection that would need exceptional justification.</p> <p>Criteria d. of the policy is also not required as it only refers to another policy in the Neighbourhood Plan.</p>

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DR-20				Planning	South Norfolk Council	Policy DR5: Local gaps			✓		<p>Again, the Council commented extensively on this policy during the Regulation 14 consultation stage, and many of our concerns remain. The policy is repetitive of many of the elements of Policy DR5. It is unclear why a separate policy is required where the majority of the Local Gaps also fall with the Settlement Gaps and simply add the same protections. These policies as written are going to be difficult to apply correctly and consistently.</p> <p>The justification for Site A appears to be primarily that it provides the first and only significant sight of the Moor from the centre of Dickleburgh village along Rectory Road. The land that is designated does however appear to extend behind existing development on Rectory Road and Norwich Road which would not interrupt such views. Some further justification is made for this extension by reference to a historic map and that it provides an important 'lung' to the village. Whilst the Council can see that there may be some justification to maintain long views towards the moor along Rectory Road, there is limited information available. It is somewhat unclear why, if it formed part of a historic land holding, along with a large number of other parcels of land, there is justification for a wider protective policy on the land or why, other than the protection of visual connections to the wider landscape, the gap supports the well-being of local residents. On the basis of the evidence available the Council remains to be convinced that there is sufficient justification for the designation of this site as a Local Gap.</p> <p>In regard to Site C, Rushall does not have a defined settlement boundary and Langmere Road is a narrow rural road with limited, if any, development potential. Therefore, it is unclear why the proposed policy is required in this location.</p> <p>There are four distinct elements to Site D and it appears to be proposed for protection on the basis that the gaps between buildings provide views across The Moor, with their retention preserving the character of the setting of the Moor. The supporting text asserts that any development on the east of Norwich Road would dramatically alter the topology of the area and place at risk a fragile ecosystem, including avian and mammal habitats. The Council notes that some bat surveys are referenced that took place between the northern sites under Site D. However, it is unclear from the evidence set out how the conclusions around topology, ecosystems or habitats have been arrived at.</p> <p>On this basis of the above Council cannot currently see that the sites identified with the Local Gaps policy are fully justified and underpinned by appropriate evidence.</p> <p>In regard to the Policy itself, it is unclear how the 5 metre adjacent area has been arrived at or why it is justified. In regard to criteria a), the Council would repeat the concerns raised in regard to the same criteria for Policy 4, specifically that as written it is unclear. Consideration would also need to be given about whether alternative sites are available, suitable and can be viably developed for the development proposed.</p> <p>In regard to criteria b) it is unclear what affecting integrity, in practical terms, means for decision making.</p> <p>In regard to criteria d), the policy criteria by which it might be judged that the local gap would be compromised is ambiguous.</p>
DR-21				Planning	South Norfolk Council	Figure 40 (page 59)				✓	<p>The annotation for Figure 40 implies that this map is the definitive document for identifying hedgerows, ditches and verges, where it might be the case that other sources are also useful. The acronym used in this annotation is also inconsistent with its use elsewhere (i.e. 'HDV' rather than 'HVD').</p>
DR-22				Planning	South Norfolk Council	Paragraph 4.65		✓			<p>The correct title of this legislation is 'The Hedgerow Regulations 1997'.</p>
DR-23				Planning	South Norfolk Council	Policy DR6: Heritage ditches, hedges and verges		✓			<p>Many of the Council's previous comments on this policy (during the Reg. 14 stage) appear to still stand.</p> <p>It is important that the plan does not contradict provisions and safeguards that already exist. For example, The Hedgerows Regulations 1997 can protect hedgerows as young as 30 years old, but the Plan focusses on hedges that have been in existence since 1843.</p> <p>Moreover, paragraph 16 of the NPPF states that policies should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular (including policies in this Framework, where relevant)." Therefore, the plan should make clear how it adds to the Hedgerow regulations and if it does not then the Council would recommend removal of those duplicative elements of the policy.</p> <p>Figure 44 will be very difficult for a developer and/or decision maker to interpret and it only shows hedgerows (not ditches and verges). The Council suggests that a clearer map showing these assets is provided, to aid decision making.</p> <p>The requirement of the second paragraph is not proportionate. It would not be viable or justifiable to require proposals involving extensions or development of one or two dwellings, for example, to enhance ditches, hedges and verges in the parish.</p>
DR-24				Planning	South Norfolk Council	Rurality principles (page 64)		✓			<p>We have particular concerns with Principle 3. Requiring any development to have a larger garden than the next building (not necessarily immediately adjacent) will be difficult in practice. It would be more practical to say that, in general, housing development should have a more spacious setting the further it is from the village centre. For example, if there is a linear development of five houses (linear development promoted elsewhere) it would be very odd if each house was to have a larger garden than the one next door. It would feel contrived and would not result in the informality and variety of dwellings that is characteristic of a rural area.</p> <p>Large sections of text within this section (e.g. 5.4, 5.6, 5.7, 5.11-5.18) state requirements of development in the style of a policy, as previously raised by the Council. This is not the role of supporting text and neither would any such statements have statutory weight if they are not part of a policy. The Council would question the viability and justification for certain of these requirements (e.g. principle 3 in para. 5.11).</p>
DR-25				Planning	South Norfolk Council			✓			<p>These paragraphs (and others throughout the document) copy whole sections from the NPPF. We consider this could be significantly condensed by simply including a brief description of the matter and a reference to the relevant NPPF paragraph.</p>

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DR-26				Planning	South Norfolk Council	Policy DR7: Design		✓			<p>A maximum of 20 dwellings per hectare is considered an extremely low density – the Council would query how has this figure been derived. This is unlikely to deliver any affordable housing using the standard land value methodology for viability assessments. No higher density is proposed for brownfield sites. The redevelopment of the former bus depot in Ipswich Road is likely to require (and potentially justify) a much higher density. The Council has commented previously that the Neighbourhood Plan appears to favour rurality over affordability and it appears that this policy is in conflict with Policy DR8: Local housing need.</p> <p>Some of the criteria included in Policy DR7 go beyond what would normally be included in a design policy, such as the requirement for mains drainage and the clause for surrounding areas to be left undamaged. Criteria such as these will likely be determined by factors beyond the design of any scheme, such as infrastructure restrictions and requirements of infrastructure providers, and therefore may be difficult to consistently apply. It might be best for this policy to focus purely on design elements that are special and unique to Dickleburgh and Rushall.</p> <p>Point 4 of the policy – we would query whether the wording should be slightly revised here. Some variation in roof pitches should be encouraged in order to retain the informal, rural character of the settlement.</p> <p>Point 8 – this element of the policy is considered to be overly restrictive. It would not be realistic to expect all future development to avoid neighbouring gardens being overlooked.</p>
DR-27				Planning	South Norfolk Council	Introduction to Policy DR8: Local housing need		✓			<p>Para. 5.28: The table is somewhat misleading because it starts after the large development in the centre of the village (c. 70 homes) was completed in the late 1990s. The Council has previously queried the notion that development of three or more houses should be considered 'large scale' development (5.30). Nonetheless, paragraph 5.30 is also written in the style of a policy which is not the role of supporting text.</p> <p>Para 5.32: Subject to confirmation by Cabinet (expected May 2025), all affordable homes for rent via S106 obligations will have a local priority. However, the low-density requirement specified in DR7 might lead to none being delivered. Currently rented homes funded by Homes England can have a local priority, but their policy could change.</p> <p>Again, paragraphs 5.33-5.35 copy elements of the NPPF, verbatim.</p>
DR-28				Planning	South Norfolk Council	Policy DR8: Local housing need		✓			<p>Starter Homes are no longer relevant and have been replaced by First Homes. The Policy should be reviewed to ensure this does not affect the applicability of the Policy and should be updated where necessary.</p> <p>The policy states that the mix of new housing should be based on the most up-to-date Strategic Housing Market Assessment and community preferences. This does not suggest any kind or hierarchy or process, and therefore the Council would have to question what would happen in situations where these two sources are in conflict. This could result in the policy being usurped by the policy in the Greater Norwich Local Plan, which may not reflect the desires of the community.</p> <p>Criterion d – the Council is unclear why affordable housing must be part of a mixed development?</p> <p>There is no mention of possible rural exceptions policy sites. Dickleburgh already has three such developments, and this might be the best (indeed, only) way to meet local need. Inclusion of the possibility would be beneficial.</p>
DR-29				Planning	South Norfolk Council	Policy DR10: Parking for the building of new houses or conversions		✓			<p>The Council is concerned that the parking policy promotes more parking spaces than the County Council requirement, with little in the way of justification. This could result in either a car-dominated environment or areas dominated by areas of hard standing, and it encourages car use although the policy advocates against that. It would be better to correlate with the County Council guidelines and ensure sufficient visitor spaces, for example.</p>
DR-30				Planning	South Norfolk Council	Introduction to Policy DR12: Flooding and surface water drainage issues		✓			<p>Para. 5.49 appears to be missing some wording and requires attention.</p> <p>Paras. 5.50-5.52: as mentioned elsewhere, we would recommend condensing these paragraphs and avoiding the duplication of sections of text from the NPPF.</p>
DR-31				Planning	South Norfolk Council	Policy DR13: Cordon Sanitaire			✓		<p>In its response to the Reg. 14 consultation on the Neighbourhood Plan, Anglian Water states that (whilst it supports the intention of the policy), it believes the policy to have been too restrictive as written, and that some forms of development may be more compatible than others. They suggest that developers with proposals in this area should be required to undertake impact assessments and undertake a risk assessment process in consultation with Anglian Water. The current policy, however, still imposes a blanket requirement that no new housing, commercial or industrial development should occur within this zone (albeit specifying that modifications to existing buildings and the development of new utilities infrastructure should be required to undertake an impact assessment). It is considered that this remains too restrictive and that Anglian Water's previous comments are still relevant (i.e. that all proposals should be required to undertake an impact assessment).</p> <p>In addition, it is not clear through the supporting text of this policy how the 400m limit has been determined. Strong justification will be required, especially considering the scale of the area being covered. The cumulative impact of this policy, along with others such as DR4 and DR5, is that it appears to be actively seeking to prevent development of any kind in this area. This is not the purpose of Neighbourhood Plans and would put it in conflict with the Basic Conditions.</p>
DR-32				Planning	South Norfolk Council	Policy DR14: Carbon offsetting for new builds		✓			<p>The first sentence of the policy is not a requirement of development – therefore it is considered it should be moved to the supporting text.</p> <p>The policy seems to make it a requirement of all 'developers' that they fulfil each of the requirements of a-f, regardless of the scale or type of proposal. This is not considered proportionate or justifiable. Again, to use an example, would a porch extension to an existing property be required to provide new safe walking and cycling routes?</p> <p>The supporting text for this policy, on pages 86-92, is very extensive and not particularly concise in providing headline summary statements that serve to justify the policy wording of DR14. It is felt that this could be substantially condensed.</p>

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DR-33				Planning	South Norfolk Council	Policy DR15: Local traffic generation		✓			As stated during the Reg. 14 consultation and elsewhere in these comments, we would query the figure of ‘3 or more homes’ as a threshold for significant development and, in this instance, for the requirement of an assessment of traffic movement which goes further than the NPPF (para. 118 - requiring developments ‘that will generate significant amounts of movement’ to be supported by a transport assessment).
DR-34				Planning	South Norfolk Council	Policy DR16: Walking, cycling and horse riding		✓			We would query the requirement that footpaths and cycleways should be ‘green under foot’ (first paragraph). A variety of sustainable and permeable surfacing materials can be used to create such routes and, for a path that might receive heavy usage, having a grassed surface is not always the most suitable or sustainable option.
DR-35				Planning	South Norfolk Council	Introduction to policy DR17: Green corridors and Biodiversity Net Gain		✓			<p>Para. 7.1: whilst there are several county wildlife sites in the parish, only one appears to be ancient woodland. True, there are several ancient woodland blocks in the area, but most appear to be in the neighbouring parishes.</p> <p>Para. 7.10: this is written as a policy requirement, which is not the role of supporting text.</p> <p>Para 7.14 -7.15: these paragraphs para need to acknowledge that certain types of development are exempt from statutory Biodiversity Net Gain.</p> <p>Para 7.15: it is unclear what is meant by ‘curtilage development area’. Nonetheless, BNG cannot be delivered within the curtilage of a dwelling.</p> <p>Para. 7.16: the ‘relevant local planning authority’ is South Norfolk Council. This should be specified.</p> <p>Paras. 7.17-7.28: as mentioned elsewhere, we would recommend condensing these paragraphs and avoiding the duplication of whole sections of text from the NPPF and other policy/guidance documents.</p> <p>Para. 7.28 – this text is written as if it were a policy, which is not the role of supporting text. This is also referring to, but presenting in a slightly different manner, the new national BNG requirements. This is already dealt with in paragraphs 7.14-7.16, therefore we don’t see the need for paragraph 7.29.</p>
DR-36				Planning	South Norfolk Council	Policy DR17: Green corridors and Biodiversity Net Gain		✓			<p>The policy seeks to retain and protect the identified green corridors within figures 59, 61 and 62 (of which many have been identified). We consider a policy that seeks to impose blanket protection for each of these corridors would not be deemed to be in accord with the NPPF, which requires plans to be prepared positively, to contribute to the achievement of sustainable development, and make effective use of land.</p> <p>Rather than seeking a blanket protection policy, we would encourage a change of wording to address these concerns – e.g. ‘Development proposals should respond positively to the identified green corridors and proposals for new development within or adjacent to the corridors should deliver measurable net gains in biodiversity in accordance with national or local policy requirements.’</p> <p>The Council has previously questioned whether the policy should apply to all new development, as it may be too restrictive to some development such as minor extensions where the criteria may excessive. The Council would recommend the policy is applied to Major Development as defined by the NPPF.</p> <p>The Council has also previously raised that the phrase “where relevant” should be included before the word “enhanced” in the first sentence as not all development will be located such that it can enhance an identifiable green infrastructure network.</p> <p>In addition, the Neighbourhood Plan does not need to repeat statutory Biodiversity Net Gain (BNG) requirements and it cannot require statutory BNG where the development is otherwise exempt.</p> <p>The statement ‘The developer will be required to deliver a detailed and budgeted plan to evidence how biodiversity net gain will be sustained over the longer term (a minimum of 10 years)’ is confusing and it also contradicts statutory BNG requirements (which state a period of 30 years). If, however, this requirement is designed to apply where statutory BNG does not (e.g. self builds), then it needs to be clearer as to when it does apply. For example, it would not be acceptable to secure this for a householder application, but if it is intended to cover Public Open Space for self-build development, then it may be suitable.</p> <p>It is positive to see a reference to the Local Nature Recovery Strategy.</p> <p>The final line of the policy stating ‘Roads must include hedges where this will be of benefit to wildlife’ is not specific and will be difficult to apply. In theory, hedges and new planting will almost always be of benefit to wildlife (although we feel it worth noting that a mix of hedges with trees is more beneficial to wildlife than simply providing a hedge). Also, the policy does not specify how this will be measured or how this can be shown as part of a planning application.</p>
DR-37				Planning	South Norfolk Council	Introduction to Policy DR18 and Policy DR18: Local Green Spaces			✓		<p>Paragraph 7.37 states that the ‘open spaces society have identified criteria that they recommend for the identification of local green spaces, these have been used as part of the identification tabling on the following pages’. The criteria for determining whether a site can qualify for Local Green Space status is set out within paragraphs 106-108 of the NPPF, not via any other source. Although it appears that the Open Spaces Society repeat the criteria for LGS on the referenced webpage, this statement should be amended to recognise that it is through the NPPF that this designation can be conferred.</p> <p>The Council objects to the inclusion of site ‘G - The Green around the Gables and between the Gables, number 42, and the water treatment plant’, which is owned by South Norfolk Council. As raised during our response to the Reg. 14 consultation, we would question the basis on which the site is deemed to be demonstrably special to the community (pages 142/143). The Public Right of Way which is referred to runs north along the eastern boundary (not across the site) and, whilst views of the moor to the north might be observed from this footpath (as set out in key view 4 of Policy DR3), it is unclear as to how the remainder of the site is deemed to be demonstrably special.</p>
DR-38				Planning	South Norfolk Council	Policy DR19: Dark skies		✓			The policy explicitly states that ‘Street lighting will not be supported on any development’. However, there may be situations where this is required for safety purposes. Therefore, preventing this in any capacity could be argued as being preventative to what would otherwise be suitable development. Without this element, the policy would suitably protect the dark skies of the area whilst also not being overly prescriptive.

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-39				Planning	South Norfolk Council	8. Site allocation policy		✓			<p>This section provides an overview of the process used to determine the site to be allocated in the Neighbourhood Plan. However, none of the assessments have been provided as part of the evidence base. The Council would recommend that any assessments are provided as evidence to support the Neighbourhood Plan for transparency. Other evidence, such as the assessments for Local Green Spaces, have been provided and it is not clear why the Site Assessments have not.</p> <p>Para. 8.1: this paragraph is incorrect. The figure of 25 homes is based on the minimum allocation for each of the South Norfolk Village Clusters, established in order to identify the 1,200 new homes (minimum) for the rural areas of South Norfolk as set out in the GNLP (which is in place until 2038).</p> <p>‘The Selected Site’ (page 120): The site area should be stated. If the proposed 25 dwellings was to be a maximum, the inclusion of any affordable homes is questionable (see comments on Policy DR7). The allocation of the entire site for residential development is therefore questionable.</p>
DR-40				Planning	South Norfolk Council	Policy DR20: Allocation		✓			<p>The Council is supportive of the Neighbourhood Plan allocating 25 dwellings as required by the emerging South Norfolk Village Clusters Housing Allocations Plan. It is also supportive of many of the criteria included in the policy, such as requiring a coordinated approach and the preservation of historic and natural assets.</p> <p>The first element of the policy states that development should provide 25 new homes of a mix of Starter, Affordable, Custom built and Lifetime Homes. As stated previously, Starter Homes are no longer relevant and have been replaced by First Homes. This part of the policy repeats what has already been stated in Policy DR8: Local housing need and does not add any further considerations or requirements. This brings into question the need for this to be included in the policy if it is expected to meet the requirements already set out in Policy DR8. It could be interpreted that the site should deliver only affordable housing, however this may not be the case. The policy needs to be amended to ensure that the mix of housing expected to be delivered is clear and the policy can be accurately applied.</p> <p>The site area and proposed density has not been included in the policy, and it should be noted that GNLP Policy 2 requires the efficient use of land. This was raised by the Council previously and has not been addressed. The area of DR20 appears to measure approximately 3.5 ha. which calls into question if the site is making effective use of the land, as required by policy, and the viability of the site. It does not appear that any viability evidence has been provided, as recommended by the Council previously. Thought should be given to allocating more homes on DR20 or reducing its site area.</p> <p>The viability of the site could also be questioned relating to the final element of the policy which encourages the incorporation of sustainable design solutions. Without establishing the viability of the site, it can be questioned if this element of the policy will be able to be applied whilst ensuring the site is deliverable.</p> <p>Surface water mapping published by the Environment Agency identifies an on-site surface water flowpath on the southern and eastern boundaries. The Council is also aware of surface water flood risk to Burston Road, which could affect access to the site. The Council therefore considers that a Level 2 Strategic Flood Risk Assessment may be required to identify flood risk and any appropriate mitigation on site. As the site area is over a hectare, any proposed development would require a Flood Risk Assessment.</p> <p>The Policy includes a number of criteria relating to the protection and/or enhancement of existing features on or near the site, such as existing vegetation and footpath 3. It would be helpful for the application of the policy for these to be mapped, perhaps on Figure 66 or another map.</p>
DR-41				Planning	South Norfolk Council	Appendix A: Dickleburgh and Rushall Neighbourhood Plan Housing Design and Character Guide		✓			<p>The Introduction to the Design and Character Code states that any development will need to comply with the Greater Norwich Local Plan and the Joint Core Strategy. The Greater Norwich Local Plan has recently been adopted and replaced the Joint Core Strategy and therefore development no longer need to meet the requirements of the JCS. The Guide should be updated to reflect this.</p> <p>Many of the requirements of the Design and Character Code do not express anything that is inherently unique about Dickleburgh and Rushall. Many of the requirements, such as 13 and 17, are very generic and do not specify how they should be achieved. The Council has raised this previously but it does not appear that this has been addressed. The Guide would likely benefit from a further review to ensure that it is consistent with the policies contained within the Neighbourhood Plan.</p> <p>The Council also has some specific concerns relating to some of the criteria in the Guide:</p> <p>3 – this element of the Guide is now inconsistent with Policy DR7: Design which states that housing should not exceed 2-2.5 storeys.</p> <p>4 – the Council has previously stated that roof design and pitching should not be required to match existing and some variation can add to the character of an area. Policy DR7: Design states that pitching should ‘reflect’ existing development, which is closer to what the Council has recommended previously (albeit see comments on DR7).</p> <p>9 – the Council has previously advised on the 15m requirement for back gardens and it appears that this has not been changed. The Council would reiterate its concerns regarding this, including the potential impact on affordable housing where gardens may be made smaller and bungalows not necessarily needing 15m if the occupants are unable to maintain them. It is confusing to include the North Norfolk illustration when it is advice applying to a different local authority area.</p> <p>12 – while the Council supports the retention of existing features, there may be certain situations where these will need to be removed for safety reasons, such as to ensure sustainable visibility splays for road access. As written, this element does not allow for this to happen.</p> <p>15 – the Council’s previous comments still stand: reductions in space and design could lead to development not being ‘tenure blind’.</p> <p>18 – The Council’s previous comments still stand: This might be better phrased as “housing development, including the design of houses” so that it also covers ecology in garden areas and public spaces etc.</p>

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-42	Mr	Andrew	Goodman	Individual				✓			<p><i>Please note: this representation is accompanied by an additional document, which has not been included here due to it's length. Please refer to the original submission.</i></p> <p>I think the D and R Neighbourhood Plan is an outstanding document that has been extensively researched and consulted upon. I fully support the Neighbourhood Plan. There is however an area of weakness and that is the NP response to the SEA, which is itself a fine document.</p> <p>Please find attached a Word document highlighting the area that should be referenced and the means by which to effect that change.</p> <p>The adaption that needs to take effect is in the reference to peat. Peat is identified as a national strategy, it can be interpreted as a regional concern but does not appear to be a local concern. This should be rectified and can be rectified simply by accepting and adopting elements the attached document.</p> <p>The logical place for the Peat reference would be in the Dickleburgh and Rushall Neighbourhood Plan, page 31, DR2: Archaeology which could be renamed DR Policy 2: Archaeology and Soil</p> <p>Add the following paragraph to Policy 2 - Any new development, or change of use, of open, wooded or agricultural land within the Parish will require a Peat survey (as outlined by the support framework for peatland, July 2023). A developer must identify the impact of any development on the peat present within the bounds of the development and outline their proposed strategy to protect and or restore peat as part of the development. All proposed strategies must reference the peatland code.</p> <p><i>The attached document also includes suggested wording for a new paragraph of supporting text.</i></p>
DR-43	Mr	Philip	Porter	Assistant Spatial Planner	National Highways	General				✓	<p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
DR-44	Mr & Mrs	Alan & Jacqueline	Patching						✓	✓	<p><i>The following is a summary. Please see submission for full response.</i></p> <p>The NP has always preferred Site 1 for development and I do not disagree with that option. However to allocate only one site out of 22 for development could be shortsighted. At Reg. 14 there were 4 preferred sites (1,2,3&4) identified by the NP, the January 2023 SEA, see additional extract submitted) and by the residents, see consultation document. One of the four sites is also a brownfield site and currently an eyesore.</p> <p>The NP states on Page 122 (box headed Policy DR20 Allocation) that 'The Neighbourhood Plan allocates SN0516 (figure 66) for residential development, to accommodate 'up to 25 new homes.....'.</p> <p>Page 119 Section 8. Allocation Policy (Introduction to policy DR20: Allocation) states 'The Dickleburgh and Rushall Neighbourhood Plan (DRNP) is required to allocate <i>a minimum of 25</i> new homes over the plan period up to 2042'. Is the allocation up to 25 or a minimum of 25? Is the Plan suggesting that site 1 only accommodates 25?</p> <p>If additional housing, in excess of the 'minimum 25' mentioned above is required over the plan period (a situation imposed upon our neighbouring village of Scole in spite of the adoption of their NP), and if site 1, as acknowledged in the SEA, and also generally acknowledged by residents living nearby, as being subject to flooding, sewage leaks and traffic problems (see objections by Vice Chairman of the Parish Council in November 2018 to previous planning application, recorded in the Diss Mercury and EDP newspapers) it may not be able to accommodate a greater number of houses. In this scenario, additional sites for surplus development will be required. The already SEA assessed additional sites (2,3&4) approved (and preferred by residents) should remain available. The DRNP promotes small scale development, any additional housing on Site 1 beyond the current village clusters allocation of 25 (together with the previous 22 not yet built but having gained planning permission) would not constitute 'small scale'.</p> <p>In addition to this, the removal of sites 19 and 3 should be substantiated. Page 21 of the December 2024 SEA removes sites 19 and 3 due to '19 possibly not available over the plan term' and site 3 'withdrawn by the developer'. What is the explanation of the site not being available over the plan term? Can all other sites be guaranteed to be available over the plan term? Site 3 'withdrawn by the developer' needs clarification. The developer is not the same as the owner of the site. Has the owner removed the site from the 'call for sites'? If not then this site is still available and as it is one of the residents' preferred sites it should be reinstated. Furthermore, the January 2023 SEA states that site 2 is excluded because the developer has withdrawn from the site. Are both sites withdrawn and no longer available? Is this coincidence or a mistake? Have the residents been informed of the withdrawal of these sites and evidence provided to substantiate this? If sites 2 and 3 are reinstated then, as stated in the SEA (see extract below) together they provide the required housing allocation, or provide for a smaller number of surplus housing, should that be needed.</p> <p>The issue of the removal of sites was also the subject of a question to the Parish Council at the December PC meeting. The intention of that was to have the sites amended, if necessary, or explained to the village. A copy of that email is reproduced within our full submission.</p>

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-45	Mr & Mrs	Alan & Jacqueline	Patching						✓		<p>The SEA Report dated January 2023 was included in the documents published at Regulation 14. The SEA Report dated December 2024 is the document published in this current Regulation 16.</p> <p>There is now a quite separate and radically different SEA Report (December 2024) in the final submission of the Neighbourhood Plan. No public awareness of this new document has been made, as far as we are aware, since its creation. It is referred to several times in the submission documents as the January 2023 SEA describing it, in different sections of the accompanying documents variously as ‘amended’ ‘updated’ or ‘revised’. Page 6, paragraph 2.3 of the Consultation Document for example, references the SEA as the original AECOM SEA report dated January 2023.</p> <p>Why was a new, separately funded SEA necessary at all? We feel that the residents may not have been made aware of the significant changes that the new Report contains. The SEA is a very complex document and one which is quite difficult to navigate for the average reader. The new SEA outcomes impact on residents in different areas of the parish and their attention should be drawn to the new report otherwise many residents may not even realise that this is a new and different document.</p> <p>As at the time of writing (1.4.25, and 5 weeks into the consultation process), the original SEA report and original 46 page draft Neighbourhood Plan are the only documents currently displayed on the Dickleburgh and Rushall Parish Council website.</p>
DR-46	Mr & Mrs	Alan & Jacqueline	Patching			Policy DR4: Settlement gaps				✓	<p>The new SEA report establishes new ‘reasonable alternatives’. We have already questioned the reasoning behind the need for this new report. However, it introduces new ‘reasonable alternatives’ which impact on this location in the hamlet of Langmere.</p> <p>The introduction to Settlement Gaps on page 47, specifically settlement gap B page 48 states that the gap ‘incorporates in full the ancient boundaries of Langmere.’ The paragraph establishes the importance and relevance of the gap. The original SEA did not assess sites that fell within these gaps specifically because they fell within them. The comment then was ‘.....have been discounted as they are located in one or more of the following areas identified by the DRNP: the settlement gap.....’. The value and importance of maintaining these gaps to the residents has been well established.</p> <p>The Settlement Gap policy does not appear to have changed in its intention to preserve the separation of settlements, nor has the Neighbourhood Plan text relating to this changed. However, the December 2024 SEA, Page 23 section 3.2.12 states ‘Whilst additional sites (Site numbers 8,10,11,13 and 14) are identified as ‘falling within the settlement gap B, these sites are not discounted at this stage, recognising that none in isolation would fully erode the proposed gap.’ The Neighbourhood Plan does not qualify the nature of the settlement gap nor does it quantify the proportion of the gap. Why has the wording in this SEA been changed from the 2023 Report to include the word ‘fully’? This one word seems to be the ‘authorisation’ for reintroducing these sites to the ‘reasonable alternatives’.</p>
DR-47	Mr & Mrs	Alan & Jacqueline	Patching							✓	<p>As an interested party in the Neighbourhood Plan, we would like to flag up the fact that we were not notified of the submission of the Plan and associated documents as required by the Regulation 16 Consultation process.</p>
DR-48			Rebecca Walkley & Len Liggins			Strategic Environmental Assessment (Dec 2024); Whole document			✓		<p><i>The following is a summary. Please see submission for full response.</i></p> <p>We wish to object to the Neighbourhood Plan proceeding to examination and referendum on the grounds that the new version of the Strategic Environmental Assessment (SEA) dated December 2024 (which replaced the previous SEA dated January 2023) introduces new reasonable alternative housing allocations that have not been subject to prior public consultation under Regulation 14. This omission represents a clear procedural failing, undermining the legal compliance and soundness of the plan.</p> <p>Grounds for Objection:</p> <p>1. Failure to consult on reasonable alternatives - the new SEA, submitted at Regulation 16, includes seven new potential housing sites which were not presented to the public or statutory consultees during the earlier Regulation 14 consultation. These site numbers are: N2, N3, 8, 10, 11, 13 an 14 (December SEA p24). As such, stakeholders have not had the opportunity to comment on these options or their implications.</p> <p>2. Contravention of Environmental Assessment Regulations - The Environmental Assessment of Plans and Programmes Regulations 2004 require that all reasonable alternatives be assessed and consulted on at an early stage, enabling meaningful input before decisions are made. The late inclusion of new alternatives at Regulation 16, without prior public consultation, fails to meet this requirement. Case law (e.g., Heard v Broadland DC [2012]) reinforces the principle that proper consultation on alternatives is a legal necessity and not a discretionary step.</p> <p>3. Implications for soundness and fairness - the failure to consult on the full range of options compromises: the transparency and integrity of the site selection process; the ability of stakeholders to make informed representations; the examiner's ability to assess whether the plan meets the basic conditions, particularly in regard to: conformity with legal requirements; Contribution to sustainable development; general conformity with the strategic policies of the Local Plan.</p> <p>We respectfully request that the independent examiner: recommends that the plan be returned to the qualifying body for a further Regulation 14 consultation on the updated SEA, including the new reasonable alternative sites; or finds that the plan does not meet the basic conditions and should not proceed to referendum in its current form.</p> <p>This is essential to ensure that the plan is legally compliant, procedurally sound, and reflective of community engagement.</p> <p>For further details of the changes outlined in the new SEA, please see accompanying ‘Objection to Dickleburgh and Rushall Neighbourhood Plan note 1’.</p>

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-49			Rebecca Walkley & Len Liggins			SEA (December 2024), Reasonable Alternative site options 8,10,11,13,14. s.1.4 page 6			✓		<p>These site options are not set out in the earlier SEA of January 2023 which was subject to a Regulation 14 consultation. These sites were deemed to a part of the Settlement Gap (policy DR4 p.53 of the NP, this policy hasn't changed in the NP which was consulted on in 2023 or the updated NP which is on the South Norfolk Authority website). However, they have been inserted into a new SEA (December 2024) with the new reasoning that development in any of them would not 'fully' enclose the settlement gap. No reasoning has been given for this change of policy - which hasn't been changed in the NP, so why are they included in the new SAE?</p> <p>Further to this we contacted the PC in April 2021 before we moved to Dickleburgh to ask them about sites 13 and 14 (given different site allocations on South Norfolks website at the time). The PC responded to state:</p> <p>'Regarding the sites on Rectory Road – the Neighbourhood Plan are not supporting these sites – the amount of traffic using the road, the parking on the roadside (which helps to slow the traffic down) are more than sufficient but more importantly the view over Dickleburgh Moor is a much valued sight from this part of the village, along with the amount of evidence indicating that there is notable wildlife life and wildlife corridors in the area'. (copy enclosed)</p> <p>We realise that the above response was before the Neighbourhood Plan Regulation 14 consultation. However, this view must have held up to the time of that consultation in 2023 with the previous SEA (January 2023) in which these sites are not proposed as reasonable alternatives.</p>
DR-50		Sally	Wintle	Consultations Team	Natural England	General				✓	<p><i>The following is a summary. Please see submission for full response.</i></p> <p>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.</p> <p>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.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p>
DR-51		Matt	Verlander	Director	Avison Young (on behalf of National Gas)					✓	<p><i>The following is a summary. Please see submission for full response.</i></p> <p>An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>
DR-52	Mr	Delme	Thompson							✓	<p>This document makes reference to community surveys in 2017 and 2020, but makes no mention of the latest survey carried out in early 2023, the results of which were shared with parishioners circa 1 year later.</p> <p>At the time of sharing in the Parish Magazine, it was noted that 60 responses had been received in the 2023 survey, including several questions on the selection of the recommended development site and traffic impact from developing a site in the centre of the village.</p> <p>I am surprised that there is no mention of this latest engagement in the submission, and request that all materials relating to that community engagement are passed to the inspector, without delay.</p>
DR-53			Thompson			Consultation Statement			✓		<p>The way that this plan has been communicated has been poor. As a new resident in 2021, like many people in this village, I was not initially aware that there was a neighbourhood plan in process. The information about it on the parish council website is difficult to follow, out of date and it does not even mention that this final stage is taking place. There are no minutes from any of the neighbourhood planning teams meetings for example, making it impossible for residents to fully understand the process. Meetings with the developer have been poorly published and scheduled to coincide with school holidays when residents have been away. The parish council have not made efforts to ensure all stakeholders are included. There are changes in the sites proposed and some of these will not have had full consultation.</p> <p>When the survey consultation was carried out in 2023, I know that the results published did not fully reflect the views shared. There has been little information reflected in the consultation reports about the environmental and traffic impact of the proposed development in the bottle neck of the village and I know that this has been the primary concern of residents in this area. The documentation about the wildlife affected is not reflective of the habitats and wildlife we know exist in the proposed development and this is not reflected in the consultation documentation even though this was raised.</p> <p>The ongoing and increasing congestion and safety at Harvey Lane and at the junction with Rectory Road has been of significant concern for residents and the consultation has not reflected this or considered a response. The concerns about facilities in the village and lack of infrastructure has again been raised by residents in consultation but is not reflected in the consultation documentation. Residents have questioned why the proposed site over others continues to be considered when other better alternatives are available and would be preferred.</p>
DR-54		Carry	Murphy	Chartered Town Planner	Anglian Water					✓	<p>I can confirm, Anglian Water has no further comments to make on the documents.</p>

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
DR-55				Lead Local Flood Authority (LLFA)	Norfolk County Council	Policy 12: Flooding and Surface Water Drainage Issues		✓			<p><i>The following is a summary. Please see submission for full response:</i></p> <p>The LLFA particularly welcomes the inclusion of Policy DR12: Flooding and Surface Water Drainage Issues in relation to the consideration of surface water flood risk. However, it is noted that not all sources of flood risk such as groundwater have been included. The LLFA therefore recommends that a full review of all sources of flooding within the Parish of Dickleburgh and Rushall be carried to fully assess flood risk, supported by relevant mapping covering the full extent of the Dickleburgh and Rushall Neighbourhood Plan area. The LLFA also advise that the document would benefit from a link being included to ‘Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document’ (the most up to date version at the time of adoption) within the Neighbourhood Plan for ease. 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.</p> <p>According to LLFA datasets (extending from 2011 to present day), we have 8 no. records of internal flooding and 9 no. records of external/anecdotal flooding in the Parish of Dickleburgh and Rushall. 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. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA. We are aware of AW DGS records within the Parish, however this will need to be confirmed with/by Anglian Water.</p> <p>According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Dickleburgh and Rushall.</p> <p>The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area.</p>
DR-56				Lead Local Flood Authority (LLFA)	Norfolk County Council	Policy DR20: Allocation				✓	<p>We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is noted that the Regulation 16 document neighbourhood allocates housing one site in POLICY DR20 allocated for 25 dwellings. However, it is not evident to the LLFA that this has been undertaken in respect of any site allocations. If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.</p>
DR-57				Lead Local Flood Authority (LLFA)	Norfolk County Council	POLICY DR18: Local Green Spaces				✓	<p>The LLFA note that the Regulation 16 document now proposes 8 no. Local Green Spaces (a reduction and some amendments to those proposed within Environmental Policy DR18: Local Green Spaces of the document. It is understood that designation of LGS's provides a level of protection against development. The LLFA do not normally comment on 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.</p>
DR-58				Highway Authority	Norfolk County Council	Policy DR20: Allocation			✓		<p>Proposed allocation is located some distance from the highway. Third party land is required to achieve suitable access and connection to highway. Access strategy for proposed allocation is not clear and is not mentioned within proposed policy.</p>
DR-59				Highway Authority	Norfolk County Council	POLICY DR18: Local Green Spaces			✓	✓	<p>Local green space (LGS) designation comments :</p> <p>A. Dickleburgh Village Green, opposite the church - Objection - The Village Green is Highway Land and therefore designation of greenspace could impact the operation of highway or prevent maintenance.</p> <p>B. The Churchyard of St. Mary's Church, Rushall – No objection</p> <p>C. The Churchyard of All Saints Church, Dickleburgh – No objection</p> <p>D. Dickleburgh Village Hall Playing Fields – No objection</p> <p>E. The Green on Rectory Road/Catchpole Walk (new addition since Reg 14 consultation) – Objection – Policy looks to designate highway land on eastern and western extents of the allocation as greenspace. This could impact the operation of highway or prevent maintenance.</p> <p>F. The former allotment area and field (held in trust and managed by the Townlands Trust) to the south and west of Dickleburgh Church – No objection</p> <p>G. The Green around the Gables and between the Gables, number 42, and the water treatment plant. – Objection – Designation of greenspace may impact and prevent maintenance of PROW footpath 2.</p> <p>H. The entrance to High Common (new addition since Reg 14 consultation) – Objection – Policy looks to designate highway land on western and northern extents of the allocation as greenspace. This could impact the operation of highway or prevent maintenance.</p> <p>The Highway Authority objection to LGS A, E, G and H is due to the proposed allocation of highway land as this land forms part of the public highway and/or public right of way and any designation as local green space may limit the ability for NCC to fulfil its statutory duties with regard to highway improvements, management and maintenance. Therefore, LGS A, E, G and H must be removed as LGS designations.</p>

Late responses received