

Ref.	Date	Name / Dept.	Organisation	Address	Postcode	Section	Support	Oppose	Supp w. mods	Comments	Reasons
BNP-01	11/05/2024	Roy Wheeler	n/a	21 Bulwer Road Buxton	NR10 5HG	Page 21. 2.15 Public transport section 2.15.1	-	-	Y	-	There are inaccuracies in this section. None of the bus services are Community buses. All are services operated under contract with Norfolk County Council. This section suggests that the Monday and Friday bus is only available to Buxton folk, when it passes through Badersfield and Lammas. Would respectfully suggest the following is an accurate statement for section 2.15.1 and replace the existing one. There are regular bus services from North Walsham to Norwich, plus a Monday and Friday service to Aylsham, all passing through Badersfield, Lammas and Buxton. There is also a Wednesday service to Wroxham and a Friday service to Dereham from Buxton. All services are operated under contract with Norfolk County Council.
BNP-02	13/05/2024	Duncan Potter	Norfolk Police	Estates & Facilities Department, Jubilee House, Falconers Chase, Wymondham, Norwich	NR18 0WW	Whole Plan	-	-	Y	-	The National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF).  Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their 'Secured By Design' initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live.  In terms of creating and maintaining safer communities in your area, it is requested that the Neighbourhood Plan satisfactorily addresses NPPF provisions by including:  •The Neighbourhood Plan objective to 'Create and maintain a safer community and reduce crime and disorder'. •The Neighbourhood Plan policy to include 'All new developments should conform to the 'Secured by Design' and the Neighbourhood Plan will 'Support development proposals aimed at improving community safety'. •The Neighbourhood Plan to recognise that 'Police infrastructure to be supported and provided to enhance community safety and reduce crime and disorder'. Where your Neighbourhood Plan identifies new residential dwellings and / or commercial development are planned to be provided in the area, this will result in an increase in the population and local employment which will add some pressure to existing police resources in the area. To address this, further upfront investment may be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional pressure will be placed on existing police resources in your area.  We trust that these matters can be incorporated into your Neighbourhood Plan objectives / policies.
BNP-03	14/05/2024	Steve Hickling	Historic Environment Team, Norfolk	Norfolk Historic Environment Record Archive Centre County Hall Martineau Lane Norwich NR1 2SG	NR1 2SG	Policy BUX 11, paras 5.11.1 to 5.11.5	-	-	Y	-	Little mention is made of buried archaeological remains, nor of the role of our team in safeguarding buried remains and mitigating the effects of new developments on those buried remains. We would recommend contacting the Norfolk Historic Environment Record (NHER) and requesting information on designated and undesignated heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They 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.
BNP-04	14/05/2024	Planning Team	Sport England	n/a	n/a	Whole Plan	-	-	-	Y	The following is a summary; 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 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a> Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a> Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), 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.
BNP-05	15/05/2024	Philip Porter	National Highways	National Highways, Woodlands, Manton Lane, Bedford	MK41 7LW	Whole Plan	-	-	-	Y	Thank you for consulting National Highways on the abovementioned Neighbourhood Plan.  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).  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.  Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.
BNP-06	18/05/2024	Mrs Rosamund Rose	Resident	Swan Cottage, Lamas, Norwich	NR10 5AF	Whole Plan	Y	-	-	-	It is a comprehensive, carefully considered plan that seeks to retain the local heritage, yet accommodate and promote improvements and access to the countryside.
BNP-07	04/06/2024	Carry Murphy	Anglian Water	Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire	PE29 6XU	Whole Plan	-	-	-	Y	Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes.  I can confirm, I have no further comments to make and wish the neighbourhood plan group every success in taking this forward.
BNP-08	07/06/2024	Ross McGivern	Historic England	Historic England, Brooklands, 24 Brooklands Avenue, Cambridge	CB2 8BU	Whole Plan	-	-	-	Y	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.  We are pleased to note that recommendations we made in respect of archaeological non-designated heritage assets have been included in the revised plan.  Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. 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: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>

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BNP-09	10/06/2024	Tom Wignall	Avison Young on behalf of National Gas	Central Square, Forth Street, Newcastle upon Tyne	NE1 3PJ	Whole Plan	-	-	-	Y	The following is a summary; National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use. Proposed sites crossed or in close proximity to National Gas Transmission assets: An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a> Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure. Distribution Networks - Information regarding the gas distribution network is available by contacting: <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a> Further Advice - Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.
BNP-10	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	1.2 Planning Policy Context	-	-	Y	-	The statements at paragraphs 1.2.1 to 1.2.4 are now out of date as the GNLP has been adopted. The Council recognises that that these statements are likely to have been correct at the time of writing. Nonetheless, given that that examination on the plan and subsequent referendum on the plan will be conducted in the light of the examination the Council considers it important that the plan is modified to bring this section of the plan up-to-date. This is important to avoid confusion or misunderstanding. This requires amending the text to reflect the fact that the JCS and Broadland Site Allocations Document have now been superseded and that the GNLP has been adopted, including the allocations referred to at Lion Road and Aylsham Road. This comment will also apply to a number of other sections of the document, which should be similarly updated.
BNP-11	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Paragraph 2.2.2	-	-	Y	-	The Council is unclear why only access to suitable, affordable rented accommodation is included in the plan. Young people may also struggle to find suitable, affordable homes to purchase. The Council would recommend removal of the word “rented” from this paragraph.
BNP-12	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Objective 1	-	-	Y	-	Paragraph 8(2) of schedule 4B to the Town and County Planning Act 1990 sets out that a draft order meets the basic conditions if, amongst other things, having regard to national policies it is appropriate to make the neighbourhood plan. The NPPF makes it clear, for example at paragraph 18, that strategic planning policies can only be made in local plans, not Neighbourhood Plans. Neighbourhood Plans can only contain non-strategic planning policies. Policy 20 of the NPPF (under the heading Strategic Policies) sets out that “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places. Objective 1 states that “there will be limited growth in the parish, the focus of which will be Buxton Village”. The explanation of achieving Objective 1 given on page 32 of the Neighbourhood Plan states that achieving this objective means “continuing with the approach already taken in the local plan”. Whilst currently there does not appear to be any conflict between the Development Plan and Neighbourhood Plan. The Council considers that as worded the objective seeks to achieve a specific strategic policy outcome – namely limited growth in line with the current approach of the Local Plan as opposed to a different strategy for the pattern and scale of growth. In this way, the Council considers that the plan strays into the territory of strategic planning policies by setting out a policy that, whether intended or not, seeks to bind any future review of the Council’s local plan to a particular scale and pattern i.e. limited growth focused on Buxton Village. In order to address this the Council considers it necessary to amend Theme 1 to refer solely to Sustainable Growth. Objective 1 should be amended to read “The focus of sustainable growth will be Buxton Village”.
BNP-13	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX1: A Spatial Strategy	-	-	Y	-	The Council has set out concerns in relation to the Neighbourhood Plans references to limited growth and its conflict with the basic conditions under its comments in relation to Objective 1. For the sake of brevity these are not repeated here. However, in accordance with those reasons, the Council considers that it is necessary to make the following amendments to the Neighbourhood Plan: Theme 1 should be amended to refer solely to Sustainable Growth. Objective 1 should be amended to read “The focus of sustainable growth will be Buxton Village”. To ensure consistency with the above, Achieving Objective 1 should be amended as follows: Achieving Objective 1 means delivering growth in accordance with local and neighbourhood plan polices, focused on Buxton Village. The title of Policy BUX 1 should be amended to read: “Policy BUX1: A strategy for sustainable growth” In addition, and given that updates to Planning use classes can occur at any time, the Council feels it would be appropriate to add a note in relation to 2b) to allow for any subsequent revisions to the cited use classes, in order to preserve the longevity of the Plan.
BNP-14	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX4: Development and Design	-	-	Y	-	The Council seeks clarification on point 2(g), which refers to wrought iron fencing. Real wrought iron is very expensive as its production is very labour intensive, being hand bent, and it is usually only found on Georgian property. Cast iron was used for Victorian and Edwardian railings whereas modern fencing is more likely to be steel, designed to look like cast iron. To clarify this point, the Council would suggest changing the reference to wrought iron to “traditional or well-designed contemporary iron railings or fencing (including estate railings)”
BNP-15	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Paragraph 5.6.5	-	-	Y	-	The Council feels it is misplaced to use the term ‘decayed’, within the first sentence (in reference to Little Hautbois) and would suggest an amendment to ‘...which was historically part of a larger medieval village settlement’. The Council also notes that this term is used in the Design Code and again would recommend this also be updated.
BNP-16	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX9: Lammas, Little Hautbois and Badersfield Areas of Separation	-	-	Y	-	Two areas are shown on Map 14. An appropriate legend should be included on this map that identifies the two different areas shown. In regard to the policy, this seeks to restrict development, other than for land uses that need to be located in the countryside. The Council would note that the overall strategy for the pattern of development is a matter for strategic policies to be set out by the Local Planning Authority through its Local Plan. Whilst it may well be legitimate to seek policies that would avoid the coalescence of settlements, the current policy appears to extend over a large area, which exceeds what may be needed to achieve this outcome. In respect of the policy wording, it is unclear which land uses are intended to be allowed. Point 2 provides some useful clarification for the Lamas and Badersfield area. Although Policy BUX1 is a positively worded policy that, sensibly, could not be read as an exhaustive list, there is no clarity provided in the policy as regards the Little Hautbois and Badersfield area. In this way, the Council considers the policy to conflict with paragraph 16(c) of the NPPF, which requires policies to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Noting the uncertainty about countryside uses that are intended to be allowed by elements of the policy, the Council is concerned that the Neighbourhood Plan is, to all intents and purposes, seeking to establish a restriction on development equivalent to or exceeding that set out within Green Belt Policy. In this respect the NPPF is clear that new Green Belts should only be established in exceptional circumstances, the establishment of policies with similar purposes and effects to Green Belt should likely be read in this context. It is unclear that such exceptional justification is available for this policy. In the Council’s opinion, these issues could be resolved if the policy is amended with a positive wording that sets out the characteristics that new development within the area must preserve. Taking into account the policy intent, as expressed in paragraph 5.9.8 and 5.9.9, the Council has recommended alternative wording that may address these issues. <b>‘Lamas and Badersfield</b> The Lamas and Badersfield Area of Separation is designated as shown on Map 14. Development within this designated area must; • <b>Ensure</b> that a clear separation between Lamas and Badersfield is maintained • <b>Respect</b> the open and undeveloped nature of the expanse of rising land that separates Lammas from Badersfield. • <b>Respect</b> landscape setting of Lammas • <b>Avoid</b> any significant detrimental landscape impacts on the smooth, predominantly uninterrupted skyline and wide expansive views contained by the distant wooded horizons. <b>Little Hautbois and Badersfield</b> The Little Hautbois and Badersfield Area of Separation is designated as also shown on Map 14. Development within this designated area must; • <b>Ensure</b> that a clear separation between Little Hautbois and Badersfield is maintained. • <b>Respect</b> the landscape setting of Little Hautbois.’

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BNP-17	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX11: Conserving and enhancing our heritage assets	-	-	Y	-	The Council notes that the list of NDHAs has been reviewed in light of comments made by the local authority during the Reg. 14 consultation, in terms of defining the properties in more detail. However, the Council feels that there is a lack of clarity as regards “f) The centre of The Street, Lammias”. The submitted Appendix 2 ‘Non-Designated Heritage Assets’ assessment describes certain walls and houses, but also states “...whilst there are several modern structures and dwellings along this section of The Street, the old flint / brick structures create a pleasing and timeless streetscape”. This is considered too ambiguous, meaning it is not clear what exactly comprises the NDHA. The Council also feels it would be beneficial to have a map to accompany this policy with all of the proposed sites identified. This would make it easier for a decision maker to establish what is considered to be a NDHA. The Council considers these points need addressing in order to meet the clarity required by paragraph 16(d) of the NPPF.
BNP-18	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX12: Protecting sites of existing biodiversity value	-	-	Y	-	The Council noted at Reg.14 that there appears to be limited evidence or assessment that underpins the identification of the additional sites of biodiversity value. Paragraph 31 of the NPPF sets out that the preparation and review of all policies should be underpinned by relevant, adequate, proportionate and up-to-date evidence that justifies the policies concerned. The only evidence document appears to be Appendix 4, which whilst titled “Sites with existing biodiversity value and important trees in the parish” then goes on to say “The following selection has been made on the basis of how significant a contribution they make to the local landscape, how old they are (approximately, based on old maps) and whether there are relatively mature trees included.” In order to ensure that the additional allocations meet the basic conditions, as they relate to consistency with National Policy, and to ensure they can be given appropriate weight in the determination of applications for planning permission, the Council feels that not enough evidence is provided to justify the local designations contained within the plan. The Council also feels that these sites need to be clearly identified on a map. It is also not clear what the sites are which are referenced in the policy as being identified in BUX14, again due to a lack of a detailed map. There is a lack of clarity which is required under NPPF para 16(d) which requires plans to contain policies that are clearly written and unambiguous. With reference to point 4 “Where new hedgerows are planted as part of required mitigation or compensation, these should be located as part of public open space so as to future proof their maintenance” there may be some situations where this aspiration may not be possible, for example on projects where there is no requirement for open space provision. The Council feels a slight amendment as follows “compensation, ideally these should be located...” would provide clarity for a decision maker and maintain the sentiment of the policy.
BNP-19	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX14: Protecting water quality and managing surface water responsibly	-	-	Y	-	Points 6 refer to development proposals involving new build. The Council is unclear what the policy means by ‘new build’. For example, is it intended to cover all types of building operations that fall within the scope of the definition of development or is it only intended to relate to specific types of building operation? If the former, then the Council would question whether the requirements are necessarily proportionate and reasonable in relation to minor development works. The Council considers that this needs addressing in order to ensure clarity and to ensure that the policy contributes to sustainable development, as required by paragraph 16 of the NPPF.
BNP-20	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX17: Delivering sustainable design	-	-	Y	-	The Council raised concerns regarding this policy at the Reg 14 stage. Whilst some amendments have been made, the Council continues to have some concerns with the policy. The subject of the policy appears to relate to proposals that involve the erection of a new building, rebuilding or structural additions to a new building. This is as opposed to other development that might require planning permission, for example a change of use of land from agricultural to recreational open space that does not involve building operations. The Council’s concern relates to a lack of clarity within this policy, as required by NPPF paragraph 16(d), and also paragraph 31 which states that all policies should be underpinned by relevant evidence and should be adequate and proportionate, focusing on supporting and justifying the policies concerned. The Council would recommend that the policy is made more precise in this regard, including consideration of whether it would be appropriate or reasonable to apply these requirements to all types of new buildings, which may include non-habitable buildings, which might require planning permission.
BNP-21	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX19: Rural Lanes	-	-	Y	-	Based on the information provided, and having regard to paragraph 115 of the NPPF, the Council is unconvinced that it would be reasonable to require development proposals that impact on the specified parts of the rural road network to prioritise access for non-motorised users, or that necessarily this would be fairly and reasonably related to all development. The Council would recommend that point 2 of the policy is reworded to state that: ‘2. Development proposals which impact on these rural lanes should maintain or enhance: <ul style="list-style-type: none"><li>•their rural character and biodiversity value, and;</li><li>•the conditions for non-motorised users.’</li></ul> This would help ensure existing conditions for non-motorised users were maintained and would remain consistent with the quiet lanes project of the Neighbourhood Plan.
BNP-22	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Policy BUX21: Managing and mitigating adverse impacts of increased traffic movements on the parish environment	-	-	Y	-	Whilst the Council understands there may be local concerns about HGV traffic, the Council is concerned that it may not always be possible to avoid routing HGV traffic through settlements particularly in the context of the rural road network. Taking account of paragraph 115 of the NPPF (which states that ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’), the Council has been unable to establish any evidence justifying a policy which provides a blanket statement that proposals resulting in HGVs being routed through the Village will not be supported. Such decisions would need to be based on a transport assessment conducted in the context of a particular development proposal. Therefore, to ensure compliance with the basic conditions, the Council considers its appropriate to delete the words “and through the settlements” from the policy.
BNP-23	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	BUX23: Bure Valley Business Centre	-	-	Y	-	On reflection, the Council is concerned with the statement ‘employment uses will be conditioned to remove permitted development rights...’ (part 2 of the policy). Paragraph 56 of the NPPF states that ‘planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.’ The Council is concerned that this particular clause does not appear to be supported by sufficient evidence that might justify the requirement, in line with the NPPF criteria quoted above. In order for the policy to meet the basic conditions, the Council considers that appropriate justification for this clause, based on para. 56 of the NPPF, should be presented within the policy supporting text. If it is the case that appropriate justification cannot be provided, then the Council considers that clause 2 should be deleted.
BNP-24	14/06/2024	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Appendix 4 - Sites with existing biodiversity value and important trees in the parish	-	-	Y	-	Important Hedgerows There are set criteria for defining ‘important’ hedgerows and the Council would caution against using the term so definitively here. It may be that the marked hedgerows meet one or more of the criteria, but it might also be the case that other nearby hedgerows meet criteria, as well. The map implies that this is definitive information when this is not the case. It is understood that the local planning authority can only record a hedgerow as being important as part of processes set out in Regulations. This is different to, for example, a Tree Preservation Order, where the protection can be applied outside of an ‘application/notification’ process. The Council considers that wording such as ‘locally notable’ or ‘locally valued’, would be better in this instance. There could also be a reference to the fact that the Hedgerows Regulations apply. However, it is important not to make conclusions prematurely. Chapter 3 – a point of clarification: TPOs can be on individual trees, groups of trees, woodlands, or areas. Conservation Area – a point of clarification: most trees will be legally protected, and the protection is similar to that for TPOs, in many ways.
BNP-25	18/06/2024	Phillipa Nanson	Water Management Alliance	Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk	PE30 5DD	Whole Plan	-	-	-	Y	Thank you for consulting us on this phase of the Neighbourhood Plan. The Board has no additional comments to made. For our comments, please see the attached letter dated 11/04/2023 from the previous consultation phase.
BNP-26	18/06/2024	Sally Wintle	Natural England	County Hall, Spetchley Road, Worcester	WR5 2NP	Whole Plan	-	-	-	Y	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 (please see the full response).
BNP-27	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 10: Recognising and protecting our dark skies	-	-	Y	-	Due to the known adverse impacts on nocturnal wildlife from light pollution, we welcome the focus on Dark Skies, but recommend the following additional wording to ensure more robust protection for wildlife:  ‘Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats: ( <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> ). Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.’

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BNP-28	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 12: Protecting sites of existing biodiversity value	-	-	Y	-	<p>We support this policy but are concerned that the policy wording doesn't currently offer sufficient protection for County Wildlife Sites or Priority Habitats. County Wildlife Sites are areas of land rich in wildlife and outside of the nationally protected areas. We therefore recommend additional policy wording to ensure that this policy is clearer and more robust, for example: 'County Wildlife Sites, Priority Habitats and species, woodland and other natural features should be protected, retained and enhanced.'</p> <p>Buffer zones are designed to protect sensitive landscape patches and areas of high biodiversity from the impacts of development. We recommend the following additional policy wording, or similar: 'Buffer zones should be considered and encouraged around sensitive sites, where appropriate, and where this will provide ecological benefits.'</p> <p>The preamble to the policy advises that 'Loss of trees and hedgerows on a development site would require replacement tree and hedgerow planting that is directly linked to habitat value impacted. A tree with a trunk diameter larger than 15 cm, will for example require more than 1 replacement tree to provide adequate compensation. Hedgerows should be replaced following a 1:3 ratio.' We recommend that this text is part of the policy wording along with additional text to address concerns around habitat fragmentation, for example: 'Opportunities should be taken to improve continuity along hedgerows and between trees by appropriate planting in gaps to create safe corridors of movement with good continuity and cover for wildlife moving through the landscape.'</p>
BNP-29	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 13: Delivering Biodiversity Net Gain (BNG) and biodiversity enhancements	-	-	Y	-	<p>We are particularly pleased with and support the part of the vision for the NP which states that 'The parish's green spaces will thrive, providing a haven for people and wildlife alike.'</p> <p>In light of this, '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. Given the pressures facing biodiversity, we 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 in Norfolk. Natural England's biodiversity net gain study (Vivid Economics, June 2018) considered the impacts on the economics and viability of development and concluded that a biodiversity net gain requirement was not expected to affect the financial viability of housing developments (up to 20% biodiversity net gain scenario); it also suggests there is a strong case for greater ambition.</p> <p>Although we support the general wording in sections 1 and 2, we recommend that these 2 sections are amalgamated as there is some overlap and it would provide more clarity. Also, as biodiversity enhancements don't just relate to BNG but any opportunities can be sought to deliver biodiversity enhancements, for example, through community projects, we recommend the following additional policy wording, or similar: 'Opportunities should be sought to restore and enhance key habitat features of existing green and blue infrastructure, including County Wildlife Sites, Priority Habitats, Local Green Spaces, water meadows, wetlands etc. to provide a haven where wildlife can thrive. Corridors that support the movement of wildlife between areas of high biodiversity should be strengthened, to enhance the overall network of wildlife habitats.'</p> <p>We particularly support the policy wording referring to 'integrated living, brown or green roofs..' as these provide numerous benefits: increasing biodiversity, reducing run-off, improving air quality and improving thermal performance by providing shading and insulation which contributes to greater energy efficiency.</p>
BNP-30	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 14: Protecting water quality and managing surface water responsibly	-	-	Y	-	<p>As set out in Section 3, sources of flood risk in the parish include fluvial flood risk, surface water flooding and groundwater flooding. We support this policy but feel that the wording in clause 6 should be stronger, particularly with reference to the wording, 'with a strong preference for Sustainable Drainage Systems.' We suggest the following wording, or similar for a more robust policy: 'All proposals should incorporate the provision of sustainable drainage systems (SuDs) wherever feasible.'</p> <p>We also recommend the following text to provide more assurance of protecting water quality: 'Proposals involving storage of slurry, agricultural fuel oil, fertilisers and other potential pollutants must demonstrate compliance with all design and safety procedures necessary to prevent risk of discharge into the water environment.'</p>
BNP-31	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 15: protecting and enhancing our valued water meadow landscape	-	-	Y	-	We support this policy to protect and enhance the water meadow landscape. However, to ensure clarity of this policy we recommend that there is specific policy wording stating that the water meadow landscape will be protected and enhanced.
BNP-32	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 16: Local Green Spaces	Y	-	-	-	We support the designated Local Green Spaces. Green spaces provide important habitats for wildlife and can act as wildlife corridors.
BNP-33	18/06/2024	Julie Cullis	Norfolk Wildlife Trust	Bewick House 22 Thorpe Road Norwich	NR1 1RY	Policy BUX 17: Delivering sustainable design	Y	-	-	-	We support this policy on delivering sustainable design, particularly with reference to applying the Net Zero Carbon Homes toolkit. This will be extremely important in helping to tackle climate change at a local level.
BNP-34	18/06/2024	Alasdair Hain-Cole	Environment Agency	Iceni House, Cobham Road, Ipswich	IP3 9JD	Whole Plan	-	-	-	Y	<p>The following is a summary, please see full response: Thank you for consulting us on the draft submission of the Buxton with Lamas Neighbourhood Plan. For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly. We note the Greater Norwich Local Plan was recently adopted in 2024 and that the submitted Neighbourhood Plan does not allocate any additional sites. However, we have identified important environmental constraints within our remit that affect this Neighbourhood Plan Area.</p> <p>These include appropriate consideration to water quality and particularly water resources for any new development proposed in the neighbourhood plan area going forward. The response also provides a link to a joint guidance note on neighbourhood planning that the Environment Agency have produced.</p>
BNP-35	18/06/2024	Steve Hickling	Historic Environment Team, Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	BUX11: Conserving and enhancing our heritage assets	-	-	-	Y	<p>The Historic Environment team responded to a direct consultation from Broadland District Council on 14th May 2024 (our ref: CNF50434_3) with the following comments: '(Policy BUX 11, paras 5.11.1 to 5.11.5) Little mention is made of buried archaeological remains, nor of the role of our team in safeguarding buried remains and mitigating the effects of new developments on those buried remains. The Historic Environment team recommend contacting the Norfolk Historic Environment Record (NHER) and requesting information on designated and undesignated heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They 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.'</p>

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BNP-36	18/06/2024	Lead Local Flood Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	Whole Plan	-	-	-	Y	<p>Thank you for your consultation on the Buxton with Lamas Neighbourhood Plan 2023 - 2038 Regulation 16 Version, (LLFA Reference: FW2024_0458) received on 7th June 2024. Please note that the LLFA also previously provided comments relating to the Regulation 14 Neighbourhood Plan document (LLFA Ref: FW2023_0469) as part of the NCC Corporate Consultation response.</p> <p>The following is a summary of LLFA comments at Regulation 16 stage. Please see the full response for more detail.</p> <p>Of the 24 policies proposed, Policy BUX 12, BUX 13, BUX 14, BUX 15, BUX 16, BUX 17 and their supporting text, along with Community Projects 3 and 7, Objectives 6,7 and 8 and Maps 7, 8, 18 and 19, are of the most relevance to matters for consideration by the LLFA.</p> <p>The LLFA welcomes references retained in the Regulation 16 document to its important role in highlighting parish-level flood risk. The LLFA note and welcome references made to the River Bure, Camping Beck and their tributaries, along with other watercourses present in the Parish and the need to safeguard and enhance these features, along with reducing the likelihood and impacts of flooding.</p> <p>The LLFA welcomes that the Regulation 16 document now includes references to groundwater flood risk (particularly within section 3.2.10) and risks associated with reservoirs (Section 3.2.11), as well as risks to the Parish from other sources such as fluvial and surface water flooding. also welcome reference made in Policy BUX 14 relating to flood risk guidance including that from the relevant Internal Drainage Board (Norfolk Rivers IDB) and collaborative working with agencies such as the EA, IDB, Broadland Catchment Partnership and the Dudwick Estate on schemes such as the Buxton Natural Flood Management Scheme (2018) seeking to manage risk of flooding to properties along the Camping Beck in Buxton by incorporating a slow-the-flow nature -based solution.</p> <p>The LLFA further welcomes references retained to ensuring new development does not exacerbate existing surface water drainage problems or create new ones through surface water run off or displacement and benefits of the inclusion of SuDS features in new developments, and particularly welcome the enhancements made to Policy BUX14 in the Regulation 16 document with references now made to incorporating Sustainable Drainage Systems (SuDS).</p> <p>According to LLFA datasets (extending from 2011 to present day), we have 1 no. record of internal flooding and 7 no. records of external/anecdotal flooding in the Parish of Buxton with Lamas. 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 not aware of AW DG5 records within the Parish of Buxton with Lamas, 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 Buxton with Lamas. The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area.</p>
BNP-37	18/06/2024	Lead Local Flood Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	Whole Plan	-	-	-	Y	<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 not evident to the LLFA that this has been undertaken in respect of any site allocations (however it is noted that no housing is being allocated within the Regulation 16 document). 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>
BNP-38	18/06/2024	Lead Local Flood Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH		-	-	-	Y	<p>As was the case in the Regulation 14 document, the Regulation 16 document proposes 10 no. new Local Green Spaces identified within Policy BUX 16: Local Green Spaces. It is understood that designation of LGSs 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>
BNP-39	18/06/2024	Libraries Team	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	Whole Plan	-	-	-	Y	<p>The following is a summary;</p> <p>Libraries are very much at the heart of their communities, supporting them to flourish through reading, learning and information as well as through connections with culture and heritage. Increased development and housing places additional needs and demands on the capacity of the Council's existing provision, triggering the need to improve the scope of their local services involving, for example, additional or reconfigured space, digital capacity and accessibility, book-stock provision and, in some areas, mobile library provision. There is a strong need to flag this early, at the planning stage. Public libraries in Norfolk have the power to enrich the lives of individuals and communities.</p> <p>Your local library is a source of trusted information and will signpost you to the right support. It is recognised that post-pandemic, communities need support to combat social isolation and achieve cohesion. Your local library is a ready-made, welcoming and neutral community hub that will enable you to make valuable social connections.</p> <p>For future reference – for additional Library capacity, the applied average national standard is 30m2 per 1,000 population.</p>
BNP-40	24/06/2024	Natural Environment Team	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	General - Natural Environment	-	-	Y	-	<p><b>Please note the following was received as a late response and therefore will be considered at the examiner's discretion.</b></p> <p>Ecology:</p> <p>3.10 Environmental Issues: Support updated text reflecting suitable examples of visitor pressure on the sensitive sites identified.</p> <p>Vision, Themes and Objectives: Theme 4 and Objectives 6,7 and 8 are supported from an ecological perspective.</p> <p>Policy BUX 12: Protecting sites of existing biodiversity value: The policy is supported, and the Natural Environment team are pleased to note those sites and features of biodiversity value have been identified.</p> <p>Policy BUX 13: Delivering Biodiversity Net Gain: The policy is supported.</p> <p>Reference should be made to the developing Local Nature Recovery Strategy that will identify areas of priority for the delivery of off-site BNG.</p> <p>Landscape:</p> <p>Vision, Themes and Objectives: Theme 3 and 4 are supported from a landscape and visual perspective.</p> <p>Policy BUX 1: Support is given for maintaining settlement boundaries for most residential development and suitable development outside of these boundaries. This should help to prevent unwanted coalescence between settlements. This is further strengthened by BUX 9 which is also supported.</p> <p>Policy BUX 4: Support is given to the importance of retaining local character and distinctiveness through design, massing and form of development.</p> <p>Policy BUX 6: Support is given for this well worded policy to help protect and enhance the landscape character of the area.</p> <p>Policy BUX 7: Support is given for ensuring that development density is maintained at appropriate levels for the settlement pattern and surrounding landscape. This is especially important when the development land in question, in this case residential gardens, can form a vital part of the wider green infrastructure of the area.</p> <p>Policy BUX 8: The Natural Environment team support the inclusion of Priority Views and Locally Iconic Views and their protection through this policy.</p> <p>Policy BUX 9: (See Comments under BUX 1).</p> <p>Policy BUX 10: The recognition and protection of Dark Skies is supported and the Natural Environment team support ideas such as minimised, timed and angled lighting.</p> <p>Policy BUX 15: It is encouraging to see this policy to protect and enhance a unique landscape in the parish and Natural Environment team support the inclusion of this well worded policy.</p> <p>Public Rights of Way/Access:</p> <p>Vision Themes and Objectives: Theme 6 is supported</p> <p>Policy BUX 18: Support is given for the aim to protect and enhance the provision and quality of rural routes for non-motorised users in the parish.</p> <p>Support is given for the objective of protecting and enhancing the PRoW network through development in the parish. The aim of developing further PRoW within the Parish is supported for the benefit that this will provide to residents and visitors.</p>
BNP-41	24/06/2024	Minerals & Waste	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	Paragraph 5.21.1	-	-	Y	-	<p><b>Please note the following was received as a late response and therefore will be considered at the examiner's discretion.</b></p> <p>Further to my email yesterday, if it is not too late to add additional comments, then we consider it would be helpful for the Neighbourhood Plan to include the following text in paragraph 5.21.1 for clarity:</p> <p>5.21.1 The NP can also have a say highlighting the types of traffic movement which would have adverse impacts on road safety, the parish environment and residential amenity. [insert] However planning for minerals and waste development proposals are outside the scope of the NP, and subject to the existing policies in the adopted Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted September 2011) and the emerging replacement Norfolk Minerals and Waste Local Plan, which is anticipated to be adopted in 2025.</p>