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| CNP-01 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | General | Y | | | | The Neighbourhood Plan is well presented and has clearly been thoroughly prepared. It is positive to see that many of the comments provided by the Council previously have been actioned. |
| CNP-02 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 15 – Policy 1 Sustainable Design and Building Practices | | | Y | | Within the first paragraph, fourth bullet point, the wording is not considered consistent with the emerging GNLP. Policy 2 of the GNLP states that ‘Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher standard’. This is caveated at the beginning of the policy which states that all of the considerations should be applied ‘where relevant’. However, the use of the term ‘where possible’ in Policy 1 of the Neighbourhood Plan could be seen to be inconsistent. ‘Where possible’ suggests that there could be situations where the standard could not be applied beyond the caveat already provided within the GNLP and could lead to the policies being applied inconsistently. For consistency purposes the Council would suggest the use of the same wording as the GNLP, replacing ‘where possible’ with ‘where relevant’. Part 2, Retrofitting Existing Buildings – the Council acknowledges that supporting text has been updated to request that this is demonstrated as part of the planning application. However, the Council remains concerned that the policy wording itself lacks the necessary clarity as to how applicants should demonstrate that this has been considered. The Council considers these amendments are necessary in order for the policy to be in accordance with the basic conditions and to meet the clarity required by paragraph 16 of the NPPF. |
| CNP-03 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 25 – Policy 4 Affordable Housing | | | Y | | The current wording of this policy does not provide any flexibility to account for any potential future changes to the population, whose needs may need to be met by a different mix of affordable housing types. It is typical for policies on affordable housing to provide a criterion stating that different mixes will be supported where the most up-to-date evidence justifies this. In addition, Policy 4 of the Joint Core Strategy and emerging Policy 5 of the Greater Norwich Local Plan both require a mix of affordable housing sizes, types and tenures, taking into account the most up-to-date evidence. These are strategic policies, with which the Neighbourhood Plan must be in general conformity. The Council will make decisions on applications in accordance with its own strategic policies. Similar references are included within the Council’s current and emerging strategic policies in relation to market homes (this relates to the Council’s previous comments about the need for 1 bedroom homes). The Council recommends this an appropriate statement reflecting that different mixes will be supported where the most up-to-date and appropriate evidence justifies it is included within the policy, as it has been in Policy 5. This will ensure that the policy contributes to sustainable development, as required by paragraph 16 of the NPPF. |
| CNP-04 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 40 – Policy 7: Biodiversity and Blue/Green Corridors and Figure 11 (page 41) | | | Y | | The Council is aware that, since the publication of additional Planning Practice Guidance (PPG) and regulations in relation to Biodiversity Net Gain (BNG), in November 2023, there are likely to be implications for the operation of certain elements of Policy 7, particularly once BNG becomes mandatory (expected January 2024). Where there is a conflict, national legislation will override the conflicting element of the Neighbourhood Plan policy. The Council therefore suggests certain amendments to the policy, as detailed below, in order to ensure that any conflicts with emerging BNG legislation are kept to a minimum. Criterion (a) suggests an ‘either or’ option – i.e. requiring developments to deliver measurable net gain or deliver qualitative improvements. Once BNG becomes mandatory, there will not be an option to provide qualitative improvement -it must be quantitative (demonstrated using the BNG metric). In addition, as currently worded, the policy is not proportionate. For example, householder applications and s73 variations are exempt from BNG, but part (a) of the policy simply refers to ‘built development’. Other elements of the policy refer to ‘proposals’ and ‘new development proposals’. The Council considers that further clarification needs to be made, ensuring that the various requirements are proportionate. It is positive for the policy to provide guidance on where off-site net gains should be directed. It should be noted that, under BNG legislation, such off-site locations will need to be included on a national register. However, the Council also notes that there could be potential for conflict in the way that criterion (d) has been drafted - Under criterion (d), if a development requires off-site gains and there would be a greater benefit in these being located as close as possible to the site (for example to replace an asset that has been lost), will developers still be expected to locate the gain(s) within the Green/Blue Corridors, in the first instance, even if these corridors are located further away from the site? This criterion suggests a hierarchy which has the potential to make certain areas less valuable and could lead to detrimental effects, as written. Figure 11 appears to be missing some key areas of public open space, such as the land between the A146 and the housing at Gunton Road and Cannell Road. This space also constitutes a green corridor. In addition, not all of the open spaces owned by South Norfolk Council, which contribute to the green network, have been included in the map. This includes Pyes Mill, the land off Bridge Street, and the open space at Filbert Road. Whilst not an objection to the proposed policy, the Council also notes that Figure 11 does not include aspirational GI corridors, particularly within the south-western area of Loddon which is currently poorly served by green infrastructure that connects habitats. The Council considers that these amendments are necessary in order that the policy achieves the clarity required by paragraph 16 of the NPPF, as well as contributing to sustainable development. |
| CNP-05 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 54 – Policy 8: Local Green Space | | | Y | | The Council raised concerns during the Regulation 14 Consultation regarding the allocation of ‘Green Space behind Grebe Drive, Chedgrave’ as a Local Green Space. As stated previously, the site does not appear to meet the criteria set out in NPPF paragraph 102. The site, at over 6ha, could be argued to be an extensive area of land as defined by the NPPF. Also, whilst not ultimately allocated, this site was identified as suitable for development through the GNLP site assessment process. Should a further need for development be identified it may be that this could be considered a candidate site and as such the LGS designation may not be capable of enduring beyond the plan period. The Council objects to the inclusion of this site as a proposed LGS on the basis that it does not meet the criteria specified in paragraph 102 of the NPPF. |
| CNP-06 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 67 – Policy 10 Employment Growth | | | Y | | It is felt that the policy could benefit from the consideration of the amenity of neighbouring uses, especially if this includes residential uses. The Council would recommend that this is referred to within the policy wording, in order to ensure it contributes to sustainable development as required by the NPPF. |
| CNP-07 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 75 – Policy 13: Protection and Enhancement of Public Rights of Way | | | Y | | The Council commented during the Regulation 14 consultation that the second paragraph reads as a series of project aspirations for the enhancement of the PRoW network. It is felt that further amendments are required to this paragraph to make it clear that any such enhancements should relate to appropriate development proposals. As it is, the paragraph still seems to indicate a series of project aspirations, which would be better located within supporting text. This amendment would help to bring the clarity and precision required by paragraph 16(d) of the NPPF. |
| CNP-08 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Page 79 – Policy 14: Community Facilities | | | Y | | The Council commented on this policy as part of the Regulation 14 consultation. Whilst several of the comments have subsequently been addressed, the Council still has a concern regarding the final three paragraphs that they would better placed outside of the policy and in a separate community aspirations section of the plan. These sections deal with investment in community facilities. As stated previously, it is inferred through the policy that improvements may be financed via s106 agreements, but other funding streams such as the neighbourhood element of CIL contributions and other external funding should not be discounted. It is likely that some of the improvements specified could be achieved without the need for development or use of land, beyond the scope of the Neighbourhood Plan policies. In addition, the fourth paragraph would seem to preclude the provision of new community facilities. Is this what is intended? The Council considers that amendments are required to these elements of the policy in order to ensure the policy is clear and unambiguous, as required by paragraph 16(d) of the NPPF. |
| CNP-09 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Housing Needs Assessment | | | Y | | The Council previously commented on the HNA at the Regulation 14 stage. The Qualifying Body’s response to these comments was that there was no further scope to make changes to the guide, as it was produced by an external consultant, AECOM, and the final document had already been signed off and completed. Whilst the comments previously raised have not been addressed, the Council considers that amendments should have been made to the document, in particular para. 175. This paragraph, which claims there is enough 1 bedroom accommodation, would appear to ignore para. 103 which provides evidence of unmet need for 1 bedroom social rented housing. Through its work with other Qualifying Bodies, the Council is aware that amendments to HNAs and Design Guides have been able to be made via a follow-up approach to AECOM. The Council believes that this should also be the case here, to ensure that the clarity required by paragraph 16(d) of the NPPF is achieved, particularly as the HNA is a document that will sit alongside the Neighbourhood Plan as an important reference document. |

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| CNP-10 | 02/02/2024 | Place Shaping Team | South Norfolk Council | Horizon Centre, Broadland Business Park, Peachman Way, Norwich | NR7 0WF | Design Guide & Codes | | | Y | | The Council previously commented on the Design Guide & Codes at the Regulation 14 stage. The Qualifying Body's response to these comments was that there was no further scope to make changes to the guide, as it was produced by an external consultant, AECOM, and the final document had already been signed off and completed. Whilst the comments previously raised have not been addressed, the Council considers that the amendments suggested through our Reg. 14 consultation response (copied below) should have been made to the document, in order to ensure it is accurate and remains consistent with the Neighbourhood Plan. Through its work with other Qualifying Bodies, the Council is aware that amendments to HNAs and Design Guides have been able to be made via a follow-up approach to AECOM. The Council believes that this should also be the case here, to ensure that the clarity required by paragraph 16(d) of the NPPF is achieved, particularly as the Design Guide is a document that will sit alongside the Neighbourhood Plan as an important reference document. Comments raised at Reg. 14 stage: Page 12 – the map doesn't show the Registered Park and Garden properly. It is shown correctly on Figure 18 of the Neighbourhood Plan, however. Page 41 (and page 7) – Active travel. It may be useful to show the route of Sustrans route 1 which runs through the area (acknowledging this is shown in Figure 17 of the Neighbourhood Plan). In addition, there is also a potential local connection (via Heckingham) to Route 31 and the Reedham ferry. The route to Heckingham could usefully be promoted for recreational cycling, as this is a little used car route. Page 45 – the Council would only generally advise on rear parking courts if they are partially fronted in relation to the property and safe/secure. In addition, rather than stating 'minimise impervious surfaces', the Council suggests 'avoid impervious surfaces'. Page 46 – the diagram is not consistent with Norfolk County Council parking standards. Page 49 – this section should acknowledge Secure by Design and not show routes which are not well overlooked and which do not feel safe. Too much permeability can create Secure by Design issues. Page 77 – It is felt that the diagram should show more frontage street planting / lawn in front of the industrial units. Ideally there would be a green buffer. This would be considered more important than, for example, allowing parking to the front of units if the building is set back and planting is provided to the front. The NPPF street tree planting requirements apply to all development, not just housing. Page 82 – Street grid and layout. It is felt there should be a reference to Safe Streets here, in terms of surveillance (and perhaps Healthy Streets?). Routes should provide visual interest for pedestrians. |
| CNP-11 | 06/02/2024 | Operations (East) | National Highways | Woodlands, Manton Lane, Bedford | MK41 7LW | General | | | | Y | 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. |
| CNP-12 | 13/02/2024 | | Norfolk Constabulary | c/o NPS Property Consultants, 5 Anson Rd, Norwich | NR6 6ED | Objectives | | | Y | | The following is a summary. See representation for full details: In terms of creating and maintaining safer communities, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area. The Neighbourhood Plan should take the opportunity to include within its objectives in section 3 (on page 8) to 'create and maintain a safer community and reduce crime and disorder'. This would be consistent with NPPF advice, and it is disappointing that this consideration is currently excluded. |
| CNP-13 | 13/02/2024 | | Norfolk Constabulary | c/o NPS Property Consultants, 5 Anson Rd, Norwich | NR6 6ED | Policy 6: Design | | | Y | | The following is a summary. See representation for full details: In terms of creating and maintaining safer communities, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area. The Neighbourhood Plan highlights within its provisions the importance of good design. It is therefore surprising that within section 6, the Plan is silent on crime and disorder issues and fails to offer support for the well-established principles of crime prevention through good design and the 'Secured by Design' approach (as the design and layout of the built environment plays an important role in designing out crime, reducing the opportunities for and risk of anti-social behaviour along with allaying residents fear of crime and disorder). It is considered that Neighbourhood Plan policy 6 should include a provision that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by an objective to 'create and maintain a safer community and reduce crime and disorder'. |
| CNP-14 | 13/02/2024 | | Norfolk Constabulary | c/o NPS Property Consultants, 5 Anson Rd, Norwich | NR6 6ED | Section 9 | | | Y | | The following is a summary. See representation for full details: In terms of creating and maintaining safer communities, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area. The Neighbourhood Plan currently fails to recognise that police infrastructure will play an important role to support development and meet the needs of residents and enhance community cohesion and safety. It is considered that this omission should be addressed in the Neighbourhood Plan with police services referenced in section 9. |
| CNP-15 | 08/02/2024 | Historic Places Advisor | Historic England | Brooklands, 24 Brooklands Avenue, Cambridge | CB2 8BU | General | | | | Y | 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: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ |
| CNP-16 | 19/02/2024 | Mr Stuart Amey | Resident | | | General | Y | | | | This plan is well thought out and reflects the ethos of a small, self-contained, rural town. Future developments should reflect and protect this. The need for large scale housing developments should be in locations with railway connection to reduce the need for cars. |
| CNP-17 | 04/03/2024 | Planning Policy | The Broads Authority | Yare House, 62-64 Thorpe Rd, Norwich | NR1 1RY | Para 26 | | | | Y | Para 26 says: 'They are the national and local plan policies within the Broads Authority and South Norfolk District Council area'. The Broads and South Norfolk Local Plans do not contain national policies. And the sentence does not end by saying 'Local Plans'. To be correct, the sentence needs to read: 'These are the national and local plan policies within the Broads Authority and South Norfolk Council Local Plans'. |
| CNP-18 | 04/03/2024 | Planning Policy | The Broads Authority | Yare House, 62-64 Thorpe Rd, Norwich | NR1 1RY | Para 27 | | | | Y | There is a typo here - should read, '...local plans...'. |
| CNP-19 | 04/03/2024 | Planning Policy | The Broads Authority | Yare House, 62-64 Thorpe Rd, Norwich | NR1 1RY | Para 65 | | | | Y | The most recent NPPF is 2023. |
| CNP-20 | 04/03/2024 | Planning Policy | The Broads Authority | Yare House, 62-64 Thorpe Rd, Norwich | NR1 1RY | Para 99 | | | | Y | Major sites BNG is 12 February 2024. |
| CNP-21 | 04/03/2024 | Planning Policy | The Broads Authority | Yare House, 62-64 Thorpe Rd, Norwich | NR1 1RY | Policy 1: Sustainable Design and Building Practices | | | Y | | Policy 1. At REG 14 stage the Broads Authority said: Policy 1 - is contrary to our policy SP15 as Policy 1 proposes dwellings outside of the development boundary. Also, DM42 of the Local Plan for the Broads says that 'custom/self-build dwelling proposals will be considered in accordance with other policies in the Local Plan on the location of new dwellings'. This part of Policy 1 could also be contrary to NPPF para 80. We feel this needs to be removed as there does not seem to be justification for a policy stance contrary to local and national policy. You responded saying you will amend the policy to say it specifically refers to outside of the Broads. The policy now says: Non-major (less than 10 units) self-build proposals for net zero carbon homes will be supported in principle where they: a) Are within or adjacent to the settlement boundary in the South Norfolk Planning Authority area; and b) Meet or contribute to the meeting of an identified and demonstrable local need. But I am not sure this addresses the issue. By not saying the Broads, it is not clear what the policy stance for the Broads is. I assume that a lack of reference to the Broads means that part of the policy does not apply to the Broads and therefore defer to the Local Plan for such development in Loddon and Chedgrave. But it does not say this. The actual paragraph and bullet points does not really work. It seems that the reason for this policy is to allow self-build schemes of less than 10 to be outside development boundaries if they are net zero and there is a need. But the bullet points confuse things. I wonder if the following better reflects what you mean: "In the South Norfolk Planning area, schemes for non-major (less than 10 units) self-build proposals adjacent to the settlement boundary will be supported in principle where they are net zero carbon homes and meet or contribute to the meeting of an identified and demonstrable local need". |

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| CNP-22 | 07/03/2024 | Magnus Magnusson | Parker Planning Services Ltd | Spire House, 13-15 Cathedral St, Norwich | NR1 1LU | Policy 8: Local Green Space | | Y | | | <p>The following is a summary. See representation for full details: Our client opposes the designation of the following sites as Local Green Space (LGS) and for the reasons outlined within the context of their Reg. 16 'Basic Condition Statement' that accompanies this submission: Site 10 - Green Space behind Grebe Drive, Chedgrave: The landowners have intimated that public access rights will be reviewed on designation as LGS and any recreational value (that contributed this sites designation in the first place) may well be lost consequently. The site comprises grade 2 (very good)/grade 3 (good to moderate) agricultural land, according to Natural England's ALC map for the eastern region and is currently in agricultural use, being cropped on a rotational basis. As such it is unclear what 'recreational' value the site or why it is 'demonstrably special' and/or has any particular 'local significance' for the local community it is intended to 'serve'. The site comprises an extensive tract of land at 6.58ha (the largest 'space' under consideration) and more than 3 times the extent of the average sized LGS. This site will continue to be promoted for residential development within the context of the GNLP and any subsequent review. Latest adopted or 'made' plan/policy takes precedence and LGS designation will be lost on allocation for housing. The site has been deemed potentially 'suitable' for allocation (residential) within the context of any review of the GNLP and by the LPA, as part of their HELAA assessment (see appendix A). Indeed, and as evidenced within the context of HELAA, the site is considered more suitable than one of the two recent GNLP allocations and equally as suitable as the other. Site 11 - Chedgrave allotments, Hardley Road, Chedgrave: The Landowner will likely review the existing rental agreement were the site to be designated as formal LGS, meaning its use as allotments might no longer be viable. At this point, the recreational 'value' that contributed to its designation might well be lost. The site is in a suitable (sustainable) location for residential development and an alternative site for the allotments can potentially be found. The site will be promoted for residential development by the landowner in the medium to longer terms. On allocation, designation as LGS will be lost and potentially before the end of the CNP plan period. Site 16 - Chedgrave Hills Woods: Public access 'rights' to the site will be reviewed and potentially lost on designation as LGS and consequently, any recreational 'value' that contributed to its designation in the first place may well be lost at this point. The site constitutes an extensive tract adjacent to the settlement limits, that is potentially suitable for residential development. The Landowner will be promoting the site for residential development within the context of any review of the GNLP and on allocation, any LGS designation would be lost (and which might be before the end of the CNP plan period).</p> |
| CNP-23 | 08/03/2024 | Spatial & Strategic Planning | Anglian Water | Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. | PE29 6XU | General | Y | | | | <p>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 previous comments and recommended changes to the following policies. These have all been addressed satisfactorily. Policy 1 (Sustainable Design and Building Practices) – inclusion of the optional water efficiency standards to reflect the emerging Greater Norwich Local Plan. Policy 3 (Managing surface Water Flood Risk) - amendments to strengthen and clarify the policy position and cross referencing on managing surface water effectively on site, whilst achieving benefits for biodiversity and amenity and opportunities for rainwater/storm water harvesting and reuse. Policy 7 (Biodiversity and Blue/Green Corridors) – referencing 'ecological function' of the Blue/Green corridor to provide clarity within the policy. Policy 8 – Local Green Spaces) – the policy qualifies that temporary engineering operations are appropriate within LGS areas, which is consistent with national green belt policy. To reiterate, it is considered that operational development by Anglian Water to maintain or repair our infrastructure within the proposed LGS areas would be supported by the policy. Overall, we are supportive of the policy ambitions within the Neighbourhood Plan. I can confirm, I have no further comments to make and wish the neighbourhood plan group every success in taking this forward.</p> |
| CNP-24 | 10/03/2024 | Tim Silcox | Loddon Quay Ltd | 7 Wherry Close, Chedgrave | NR14 6LS | Fig. 13 - Designated Local Green Spaces; Chapter 8: Recreation - para 1.39, Policy 13 (p75); Chapter 9: Ensuring infrastructure to meet community needs - paras 1.45-1.46, Policy 14 (p79) | | | | Y | <p>The following is a summary. See representation for full details: 1. Loddon Quay Ltd expects to maintain the Millennium garden for the sensible use of the community. 2. Loddon Quay Ltd will continue to provide access to the Millennium Garden (as required by the legal obligations each owner of the properties on Wherry Close agreed to on purchasing said properties. 3. Loddon Quay Ltd does not accept any obligation to provide access between the Millennium garden and the Staithe car park. 4. Loddon Quay Ltd considers that providing access as above would make it more difficult to control the antisocial behaviour which at present occurs on the Staithe in the warmer months whilst extending the area of concern. Loddon Quay Ltd recognises the work of the Police and the Council alongside the community (including Wherry Close residents) in trying to control the antisocial behaviour of the minority on the Staithe. In recent years there have been extremely few unsavoury incidents in the Millennium garden (1 of note). 5. Loddon Quay Ltd is disappointed that the "extensive process of community and stakeholder engagement, evidence gathering and consultation " mentioned in the letter we received from Richard Squires (Senior Community Planning Officer) seems to have ignored the owners of Wherry Close Millennium Garden. (continued next page) 6. Loddon Quay Ltd accepts that the current state of the Millennium Bridge is not acceptable and needs addressing. It an environmental eyesore seen by the community - none more so than the residents of Wherry Close.</p> |
| CNP-25 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 1: Sustainable Design and Building Practices | Y | | | | We fully support Policy 1 and the overall objective of working towards net zero emissions across the plan area. This will be extremely important in helping to tackle climate change at a local level. |
| CNP-26 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 2: Electric Vehicle Charging Points | Y | | | | We fully support Policy 2 as new development should cater for electric vehicles which will contribute towards reducing greenhouse gases and other air pollutants. |
| CNP-27 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 3: Managing Surface Water Flood Risk | Y | | | | <p>We note that fluvial flood risk is an issue in parts of Loddon and Chedgrave, close to the River Chet and the Broad.</p> <p>We support the inclusion of SuDS in Policy 3 and particularly the wording 'New development must seek to reduce flood risk overall through creation of multifunctional green and blue infrastructure and include SuDS..... Multifunctional benefits should be maximised, including planting, which is good for biodiversity.'</p> <p>Sustainable Urban Drainage Systems (SuDS) are significant in reducing flood risk, reducing pollution downstream and locally, increasing biodiversity and when used effectively can provide habitat connectivity.</p> |
| CNP-28 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 7: Biodiversity and Blue/Green Corridors | | | Y | | <p>We support Policy 7 as this will be important in safeguarding wildlife and habitats within and adjacent to the NP area. However, we recommend some changes to the policy, as detailed below: There is a designated Roadside Nature Reserve (RNR: 96) at the junction of the A146 and Becles Road. We strongly recommend that this is included and referenced in the preamble to Policy 7, perhaps at section 94. The State of Nature[1] 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. We are fully supportive of the identified Green and Blue Corridors which will be important in connecting wildlife habitats and reducing fragmentation. Having green and blue corridors represented on a map, as at Figure 11, is very useful as it clearly shows where opportunities exist for BNG delivery and where it can be most readily targeted. We note at section 106 that: 'Using buffers between development and any adjacent County Wildlife Sites (CWS) which is set aside for wildlife' can be included as part of biodiversity enhancement or protection. Buffer zones are crucial in helping to protect sensitive landscapes and areas of high biodiversity from the impacts of development. We therefore recommend including the following as part of the policy wording, to ensure this policy is robust: 'Buffer zones should be considered and encouraged around sensitive sites, for example, around the County Wildlife Sites, where appropriate, and where this will provide ecological benefits.' We particularly advocate the addition of green roofs/walls to new buildings as they 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. We therefore recommend additional wording, for example: 'The addition of green roofs and/or green walls to any new buildings should be used, where possible and as appropriate.'</p> <p>[1] State of Nature 2023 - report on the UK's current biodiversity</p> |
| CNP-29 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 8: Local Green Space | Y | | | | We support the inclusion of the 16 Local Green Spaces. |
| CNP-30 | 12/03/2024 | Planning & Advocacy | Norfolk Wildlife Trust | Bewick House, 22 Thorpe Rd, Norwich | NR1 1RY | Policy 15: Walking and Cycling Improvements | Y | | | | We support Policy 15, with particular reference to the last paragraph of the policy wording as this will help to provide stepping stones for wildlife and habitat connectivity: 'Opportunities to create a green walking and cycling network, with planting that offers habitat opportunities to local wildlife, should be taken, and will be seen as a planning benefit.' |

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| CNP-31 | 13/03/2024 | ICS Strategic Estates | Norfolk & Waveney Integrated Care System | | | Para. 168 | | | Y | | <p>Firstly I would like to acknowledge and thank you for the inclusion of comments made by the ICS strategic estates in the Reg 14 consultation. Further to these comments we would like to request that the Neighbourhood plan includes wording to indicate that if any further healthcare infrastructure work is required in the area this would require utilisation of developer contributions via CIL or section 106.</p> <p>I would also like to take this opportunity to request a minor amendment to the existing text as stated below in red:</p> <p>168. The provision of key services and their availability, particularly once the population grows because of additional housing, is a concern for residents. This was identified at both the consultation day and from the survey responses. Expansion of local schools, dentists and doctors was seen as a key priority and some people indicated that it is already difficult to get medical appointments. At Regulation 14, NHS Norfolk and Waveney Integrated Care System Estates Department commented that the Chet Valley Medical Practice currently has physical Infrastructure capacity, however this could be affected by the level of future development. The local Primary Care Network is looking at ways to better integrate community teams with primary care provision, which will help to address this.</p> |
| CNP-32 | 14/03/2024 | Consultations Team | Natural England | Hornbeam House, Crewe Business Park, Electra Way, Crewe, Cheshire | CW1 6GJ | General | | | | Y | <p>The following is a summary. See representation for full details:</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> |
| CNP-33 | 14/03/2024 | Laura Townes | Hopkins Homes Ltd | Melton Park House, Scott Lane, Woodbridge, Suffolk | IP12 1TJ | Policy 8: Local Green Space | | Y | | | <p>The draft Neighbourhood Plan proposes the designation of the "Green Space behind Grebe Drive" as a Local Green Space. The owners of the land and the District Council have both previously objected to this designation. Hopkins Homes Limited also objects to the proposed designation for the following reasons:</p> <ul style="list-style-type: none"> • The designation does not meet the criteria set out in NPPF para 106b because: <ul style="list-style-type: none"> > the site is privately owned arable land that no longer allows public access so it has no current recreational value > the site is in agricultural use so has low potential to sustain richness of wildlife > the site is screened from public view by the trees and vegetation along Big Back Lane so provides no public benefit of beauty or tranquillity > the site has no historic designations or significance. • The designation does not meet the criteria set out in NPPF para 106c as the 6 ha site is an extensive tract of land. • The designation does not meet the criteria set out in NPPF para 105 as the site has been found suitable for residential development in the District Council's Housing and Economic Land Availability Assessment so its designation as Local Green Space is not consistent with the local planning of sustainable development or complement investment in sufficient homes and, as a result, the designation is not capable of enduring beyond the end of the plan period. • Figure 17 (relating to Policy 13: Protection and Enhancement of Public Rights of Way) identifies a "desired footpath" around the boundaries of the site to the rear of Glebe Drive. The District Council has previously recommended that any such enhancements should relate to appropriate development proposals. The designation of the site as a Local Green Space would preclude the ability for the desired footpath improvements to be delivered via a residential development proposal. |
| CNP-34 | 14/03/2024 | Laura Townes | Hopkins Homes Ltd | Melton Park House, Scott Lane, Woodbridge, Suffolk | IP12 1TJ | Policy 9: Key Views | | Y | | | <p>Hopkins Homes Limited objects to the annotation in Figure 14 which shows the location of Key View C2 from Big Back Lane (signified by black dot) with a longer black line indicating a northeast direction and a shorter black line indicating an approximately southeast direction. The black line symbol is not described on the key but the Key Viewpoints Assessment (September 2023) states on page 3 that "whilst the arrows of the views should not be taken as an indicative length it gives the understanding that from each standpoint the view can be seen in the set direction". The annotation is therefore inconsistent with the description of View C2 in the supporting text on page 60 as "Views of the trees along Big Back Lane" as the description does not refer to views across the site. The site has been found suitable for residential development in the District Council's Housing and Economic Land Availability Assessment with a RAG assessment of "green" for "sensitive landscapes". The inconsistent annotation creates unnecessary ambiguity in the interpretation of the location of the key view. The black line indicating a southeast direction across the site should therefore be deleted to provide clarification that the intended key view is of the trees along Big Back Lane in a northeast direction to accord with the description of the key view in the supporting text and the Key Viewpoints Assessment.</p> |
| CNP-35 | 15/03/2024 | Alasdair Hain-Cole | Environment Agency | Iceni House, Cobham Rd, Ipswich | IP3 9JD | General | | | | Y | <p>The following is a summary. See representation for full details:</p> <p>We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest.</p> <p>We note the Broads Authority Local Plan was adopted in 2019 and is currently under review, while Loddon and Chedgrave are also covered by the emerging Greater Norwich Local Plan and the South Norfolk Village Clusters Housing Allocations Plan. We also note that the submitted plan is not proposing to allocate any additional sites to those already allocated in the current and emerging local plans, while there are no important environmental constraints affecting this Neighbourhood Plan area that fall within our current screening matrix. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local planning authority area.</p> |
| CNP-36 | 15/03/2024 | Mr Michael Allsop | Resident | | | Policy 1: Sustainable Design and Building Practices | | | Y | | <p>Policy 1 - There should not be an 'in principle' support for any development adjacent to the settlement boundary even where it meets/contributes to an identified local need. Settlement boundaries are there for a very good reason and any development outside the settlement boundary needs a high level of justification on its particular merits and satisfaction that it cannot be met satisfactorily within the settlement boundary. 'In principle' support is inappropriate.</p> |
| CNP-37 | 15/03/2024 | Natural Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 6: Design | Y | | | | <p><u>Landscape</u></p> <p>Policy 6 Design is supported, and it is encouraging to see the consideration of settlement edge density, views and access to the local surrounding landscape, cohesive boundary treatments that don't obscure views and maintaining a sense of place and identity for the villages through design.</p> |
| CNP-38 | 15/03/2024 | Natural Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 7: Biodiversity & Blue/Green Corridors | | | Y | | <p><u>Ecology</u></p> <p>Vision and Objectives: The objectives are supported, including "protecting our green spaces and providing more places where wildlife can flourish".</p> <p>Policy 7 Biodiversity & Blue/Green Corridors: The policy is supported, noting that Figure 11 provides a very useful focus for delivery of off-site Biodiversity Net Gain requirements where developers are unable to deliver on-site BNG, as well as a focus for community environmental projects and action.</p> <p>Date for implementation of BNG needs updating to recognise that Major schemes are required to deliver this from February 2024.</p> <p>It is also recommended that the Parish Council engages in the development of the emerging Norfolk Local Nature Recovery Strategy (LNRS), as the Green Infrastructure (GI) mapping work already prepared in this Neighbourhood Plan is likely to complement the county-wide strategy.</p> <p><u>Landscape</u></p> <p>Vision and Objectives: The objectives are supported, particularly "Protecting our green spaces and providing more places where wildlife can flourish" and "Protecting Loddon's and Chedgrave's built and cultural heritage, including their streetscapes and landscapes."</p> <p>Policy 7 Biodiversity and Blue/Green Corridors and Figure 11 provide a strong basis on which to protect and enhance the important opportunities for Green and Blue Infrastructure.</p> |
| CNP-39 | 15/03/2024 | Natural Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 8: Local Green Space | Y | | | | <p><u>Landscape</u></p> <p>Policy 8 Local Green Spaces is broadly supported and the evidence for each space being designated appears robust and well considered.</p> |
| CNP-40 | 15/03/2024 | Natural Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 9: Key Views | Y | | | | <p><u>Landscape</u></p> <p>Policy 9 Protection of Key Views, linked with Policy 6 it is encouraging to see that important public views have been identified (as on Figure 14) and that these take into account views whilst using public access, views of important landmarks and views from key areas.</p> |
| CNP-41 | 15/03/2024 | Natural Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 13 Protection and Enhancement of Public Rights of Way; Policy 15 Walking and Cycling Improvements | Y | | | | <p><u>Landscape</u></p> <p>Policy 13 Protection and Enhancement of Public Rights of Way and Policy 15 Walking and Cycling Improvements are encouraging to see and Norfolk County Council Public Rights of Way officers and Cycling and Walking Officers look forward to working with the villages in the future to best achieve this.</p> |
| CNP-42 | 15/03/2024 | Historic Environment Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Section 10: Protecting Loddon and Chedgrave's Heritage | | | Y | | <p>It is suggested that a statement is included in the neighbourhood plan stating the following: 'The Norfolk County Council Historic Environment Strategy and Advice Team continues to offer advice both to Norfolk County Council and to South Norfolk District Council on historic environment issues associated with proposed planning applications, ensuring that any potential harm to archaeological remains is minimised, or that the archaeological remains are fully recorded before development takes place.'</p> |

| Ref. | Date | Name / Dept. | Organisation | Address | Postcode | Section | Support | Oppose | Supp w. mods | Comments | Reasons |
|--------|------------|----------------------------|------------------------|--------------------------------------|----------|---|---------|--------|--------------|----------|---|
| CNP-43 | 15/03/2024 | Lead Local Flood Authority | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 3: Managing Surface Water Flood Risk | | | Y | | <p>The following is a summary. See representation for full details:</p> <p>The LLFA welcomes that the Chet (Loddon and Chedgrave) Neighbourhood Plan Regulation 16 documents and its proposed policies retain references to various sources of flooding such as surface water and fluvial flooding and to the implications of climate change upon flood risk. It is however noted that there is still no reference made to groundwater flooding.</p> <p>Whilst the LLFA also welcome the inclusion of surface water flood risk mapping in Figure 5, we note that this remains in the form of a map extract and still does not cover the whole of the Chet Neighbourhood Plan area.</p> <p>The LLFA welcome that Policy 3 has been enhanced in the Regulation 16 document with the Policy now making reference to developments seeking to achieve the four pillars of SuDS, with signposting included in the policy footnotes to further guidance relating to SuDS.</p> <p>Whilst it is noted in the Chet Neighbourhood Plan Draft document that the majority of the plan area is located within in Flood Zone 1 on the EA mapping, with areas in parts of Loddon and Chedgrave close to the River Chet and The Broads being located within Flood Zone 3, the LLFA still consider the document could be enhanced through the inclusion of relevant mapping clearly identifying this. The LLFA are not aware of AW DG5 records within the Parishes of Loddon and Chedgrave however, this will need to be confirmed with / by Anglian Water.</p> <p>The LLFA welcomes that reference is now made within the document to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document'.</p> <p>We have 9 no. record of internal flooding and 11 records of external/anecdotal flooding in the Parishes of Loddon and Chedgrave. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area.</p> <p>According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parishes of Loddon and Chedgrave. Whilst we note that whilst some flood risk mapping has been included, the LLFA recommend that mapping be provided for all sources of flooding including surface water, fluvial and groundwater, with the mapping covering the entirety of the Neighbourhood Plan Area.</p> |
| CNP-44 | 15/03/2024 | Minerals & Waste Team | Norfolk County Council | County Hall, Martineau Lane, Norwich | NR1 2DH | Policy 8: Local Green Space | | | | Y | <p>The following is a summary. See representation for full details:</p> <p>In line with comments made at the Regulation 14 stage, Norfolk County Council as the Minerals and Waste Planning Authority has no objections to the Loddon and Chedgrave Neighbourhood Plan (Regulation 15 Submission Version).</p> <p>There are no minerals or waste management sites allocated within Loddon and Chedgrave NP area in the emerging Norfolk Minerals and Waste Local Plan (NM&WLP).</p> <p>As stated in our previous Regulation 14 consultation response, it should be noted that local green spaces "Loddon and Chedgrave Playing Field" (approximately 2.6 hectares) and "Green space behind Grebe Drive" (approximately 6.2 hectares) are underlain by sand and gravel resource and within a Minerals Safeguarding Consultation Area. Since the allocation is for Local Green Space, it does not sterilise the mineral resource underlain.</p> |
| CNP-45 | 15/03/2024 | Andrew Astin | WSP | 70 Chancery Lane, London | WC2A 1AF | Policy 10: Employment Growth | | | Y | | <p>Policy 10 of the draft Neighbourhood Plan aims to support the development of proposals that fall within Class E of the Use Classes Order 1987 (as amended) subject to the activity being appropriate for its location.</p> <p>We are encouraged that Loddon Town Council and Chedgrave Parish Council recognise the wider economic benefits of Class E uses and support such uses in areas within or adjacent to employment sites.</p> <p>However, for clarity, it is requested that Policy 10 is amended as suggested below to make it clearer that new and extensions of commercial or employment uses falling within Use Class E will be supported if they meet criteria a), b), c) and d). As currently drafted, it can be interpreted that only employment-related Class E uses would be supported for extensions of existing employment uses. This is not in line with the aim of the policy, which at Paragraph 126 of the draft Neighbourhood Plan, states that the Council's intention is to support the broad range of activities that fall under Class E.</p> <p><i>"Proposals for new commercial or employment uses -or and the extension s of existing premises for commercial or employment uses, which fall within Use Class E, will be supported subject to:</i></p> <p><i>a) Their being located within the development boundary, within or adjacent to existing employment sites or in a building with current employment use;</i></p> <p><i>b) Proposals do not have an adverse impact on landscape character, designated sites and biodiversity or the historic environment;</i></p> <p><i>c) Sufficient consideration has been given to transport links and parking provision, with proposals within the town centre taking opportunity, wherever possible, to provide parking on site; and</i></p> <p><i>d) Design in accordance with the relevant codes identified within the Loddon and Chedgrave Design Guidance and Codes."</i></p> |
| CNP-46 | 15/03/2024 | Andrew Astin | WSP | 70 Chancery Lane, London | WC2A 1AF | Policy 11: Protecting Key Employment Sites | | | Y | | <p>The following is a summary. See representation for full details:</p> <p>Policy 11 of the draft Neighbourhood Plan sets out requirements specific to the key employment locations identified in Figure 15.</p> <p>However, as drafted, the wording contradicts to Policy 10 which supports Class E uses in existing employment sites. We, therefore, suggest the following wording (<i>amendments to second paragraph of the policy</i>) in order to be consistent with other policies in the draft Neighbourhood Plan:</p> <p><i><u>' Commercial and e € employment uses being brought forward on the employment allocations as shown in Figure 15 from the current South Norfolk Local Plan (2015) and in accordance with Policy 10 are welcomed.'</u></i></p> |
| CNP-47 | 15/03/2024 | Andrew Astin | WSP | 70 Chancery Lane, London | WC2A 1AF | Policy 12: Main Retail Route | | | | | <p>The following is a summary. See representation for full details:</p> <p>Policy 12 of the draft Neighbourhood Plan supports proposals for new retail and leisure uses along the main retail route defined in Figure 16.</p> <p>The main retail route illustrated in Figure 16 goes significantly beyond the defined Village Centre of Loddon as set out in the adopted Development Management Policies Document (2015). The northern end of the proposed main retail route is circa 480m from the Village Centre boundary, and therefore includes sites which be defined as being out-of-centre in national retail policy terms.</p> <p>The proposed main retail route comprises existing residential and industrial uses, which are clearly not part of the current Village Centre. We, therefore, consider that the draft Neighbourhood Plan should not allocate areas outside of the Village Centre for retail and leisure uses which would normally be subject to the sequential test. This contradicts national policy (paragraphs 91 to 93 in the National Planning Policy Framework (2023)) and Development Management Policies Document (2015) Policy DM2.4, both of which require main town centre uses (including retail and leisure uses) to be directed into town centres unless it can be demonstrated that there are no suitable or available sites within the town centre (ie a sequential test).</p> <p>We suggest the following modifications to the first paragraph of the policy:</p> <p><i>"Proposals for new retail and leisure uses will be supported within the defined Village Centre along the main retail route will be supported within the identified Retail Route, as defined in Figure 16."</i></p> |