

The Dickleburgh and Rushall Neighbourhood Plan

Hearing 16.10.25

Response to submission of Parish Council Key Points

**Part 1: Response to PC Key Points (including emails) and AECOM Letter
by A. and J. Patching**

**Part 2: Concerns arising out of PC Key Points, Emails and AECOM Letter
by R.Walkley and L. Liggins**

Our response is presented in three parts.

Section 1: 'Parish Council Key Points' including emails

Section 2: the SEA

Section 3: the letter from AECOM.

by Alan and Jackie Patching, 31st October 2025

Introduction

There is no added value in going over the NP process again. We presented our case for that in our statement. In any event, there is little detail to respond to in most of the points presented in respect of the site selection process. Consequently, we will comment on what we consider are the more pertinent points. If there is anything specific relating to those points which we do not address directly, and that would benefit from our input, we are happy to provide further information.

As we cannot know the detail presented at the hearing, we can only comment on the written résumé which has been provided, so our interpretation may require additional input, which if requested, we will readily provide.

Section 1

Points raised up to and including **2bi** appear to be facts for which we make no comment.

Point **2c**, we do not know what is being referred to here and to be able to comment we need more information. If this is considered relevant, then we are happy to revisit this point. Likewise Points **2ci**, **2cii**, **2ciii** - we have no knowledge of the information being put forward.

Points **2d** to **2dii** - appear to refer to the HELAA tables. We have the HELAA tables prepared by Allan Eavis, including updated versions. We covered this document in our previous statement, however, we do not have the information mentioned in **2diii** which are zip files and which we have been unable to open. A 'preview' option shows these to be simple questionnaires for each site with a heading referencing the 400m Anglian Water exclusion zone. If these are relevant please let us know if you require comment.

We have not previously commented on the cordon sanitaire. As the subject has now become material to the discussion, and because the new SEA has seen fit to introduce new sites falling within another previously protected area, the Settlement Gap, we consider it appropriate to respond to this point.

In the second SEA, newly introduced sites 8,10,11,13 and 14, were included following an unsupported change of wording to the Settlement Gap Objective (not the Policy). It begs the question 'why didn't those sites falling within the huge Settlement Gap between Dickleburgh and Dickleburgh Moor and also within the Cordon Sanitaire, also warrant inclusion?' Particularly as the PC and AG are contending that the new SEA is 'geographical' in nature.

The current radius of the cordon sanitaire is Anglian Water's maximum limit at 400m. The Anglian Water Risk Management Table would place Dickleburgh sewage works into the green zone at a radius of 150m (200m if allowing (generously) for future growth). In any event, wouldn't Anglian Water wish to carry out an investigation into the appropriate distance for the cordon sanitaire? Other larger sewage treatment works serving greater populations do not extend to the full 400m. Anglian Water commented at Regulation 14 (their response can be found in the Consultation Statement) but did not expand on their position. Given that the cordon sanitaire negates a large number of sites, (those which also fall within the Dickleburgh and Dickleburgh Moor Settlement Gap and 4 Local Gaps in the same area) and that a more 'geographic' approach was being taken by the Chairman's review of alternative available sites, shouldn't the cordon sanitaire have been determined by Anglian Water so that any other relevant sites could come forward? To not include these pre-judges the outcome of the examination in assuming a 400m zone is warranted. We have lived in the village for 29 years and can honestly say we have only noticed the sewage works on a handful of occasions. The prevailing wind is South Westerley so blows any smells to a largely unpopulated area.

It is difficult to comment on the next points numbered **3a** through to **3h** since we do not have all the information.

Point **3i** we do not know what this is. We cannot find anything for the item '**2nd May 2021 identify site 1 going forward**' however, the meeting on the 17th June 2021 (see Appendix 1) contradicts this with regard to site 1 being identified as the site going forward as site 4 on Ipswich Road was still in the mix.

Point **3k**, PC minutes for 12th July 2021 (see Appendix 2) show that the PC Chairman/NP Chairman himself proposed the motion to pass the housing allocation to La Ronde, we suggest that this is now questionable in the light of what has, in our opinion, become an increasingly clear bias since Regulation 14, to site 1 being the only option.

Point 3l - PC minutes, 18th October 2021(see Appendix 3) refers again to more than one site being under consideration for part of the housing allocation. (Could the reader please note here that the use of North, South, East and West are continually misrepresented in

most documents presented by the PC/NP Chairman, we refer here in particular to the comment '**north and south side of Ipswich Road**'. It should read east and west side.) Errors like this were prevalent in the first draft of the October SEA and these mistakes made the document baffling and hard to read without continual cross reference.

Point **3m** 8th and 22nd July 2024 part 2 item 34? What is being referred to here?

In Section 1.1.4 point **4a**, email 4th August 2021, this again is contradictory with the July 2021 PC minutes and the October 2021 PC minutes. The email shows that AG put forward his 'personal view' that the houses should be offered to La Ronde. The indication from the email and the minutes is that the decision is still to be made between 3 sites. The PC meeting in July must have pre-empted the situation regarding Tricker and Last and awaiting their decision to develop or not.

Email evidence for 1.1.4, points **4b** to **5e**, (please note...**are there emails missing as there is some kind of numbering error here as it jumps from 4d to 5e**). The emails clearly mention 'owners' as distinct from Tricker and Last. Reading these emails suggests to us that, as we believed, the owner did not withdraw the site.

Point **4d** - not sure why the emails to IS have been included. They date back to 2019. Was there some significance attached to these in the Hearing? However, they reveal interesting comments about site 10, one of the reintroduced sites in the new SEA.

Point **5e** - email to AECOM, this does not confirm removal of the site or ask AECOM to remove it from the SEA, which is presumably the reason why it was included in the 2023 SEA? If AG genuinely thought the owner had withdrawn the site, and this was so significant, why did he not pick this up when the SEA was delivered only four months later? The SG members were not informed of the removal of the site at this time, merely the withdrawal of the development proposal by Tricker and Last, so no alarm bells were ringing until the October SEA mentioned the withdrawal of the site by the owner.

Point **5f** - email from Alex Mann confirms that site 3 cannot be considered as a Local Green Space. Site 3 was removed from the SEA on the basis that the landowner had 'allegedly' withdrawn the site. This email does not support that assertion and confirms our belief that the site remains available.

Points **5g** to **5k** - not really sure what these emails are confirming. Emails to Karen Barker seem to be irrelevant. Karen was not actively involved or contributing for maybe two years prior to the end of our being members of the SG. If there is more significance to these

emails, please let us know and we can review our comment. Is this just an attempt to justify her inclusion in emails? Also, the dates jump around so it is difficult to know exactly what we are responding to.

Section 2 SEA

Introductory paragraph **1.2.1**, we believe the emails indicate that **AG** suggested a new SEA was required, see CB's email comment **'yes, I agree that we need a new SEA'**. We would like to see the email this comment is responding to as presumably he provided the information about changes to the plan. The email preceding this from Andrea Long says **'Whilst the amendments are significant in terms of number, they are largely around clarity and conformity and in terms of policy direction there is probably little substantive change.....e.g. for example the wording of the objectives have changed in a few places and policy titles have changed'**. The SG were never consulted on the changes mentioned. The fact that AG could take it upon himself to change the Objective wordings, detail arrived at through due process of the SG and in line with the wishes of the residents, is totally unacceptable. Regarding the comment in this paragraph **'questions raised (particularly by South Norfolk District Council) that led our consultant to conclusion that there had been enough changes and policy reviews to justify a new/reviewed SEA.'**, what, exactly, were South Norfolk's questions? They have stated that they never commented on whether a new SEA was required or not. Did Rachel believe the SG were aware of these changes?

Points **1a** to **1m**, email dated 12.2.24 from AG to CB, what was the attachment? We have commented above on the emails from 25.3 to 25.7, none of which were even indicated to the SG let alone copied to them. Email 23.7.24, what are the **'policies as of now'**? What version of the NP did he send? Was this a version showing the changes to the Objectives? Did the PC see the version they signed off on?

Points **1j** to **1l**, refer to events after our resignation, however, email 30.11.24 refers to Local Gap B. AG states that **'the changes here are crucial'**. This refers to a vote on the exact size and location of Local Gap B (see Appendix 4). This is the subject matter of the comment in one of our resignation letters regarding the conduct of the vote. A vote where the Chairman declared his vote and asked for the vote of the rest of the SG. This email included K. Barker (already shown not to be a current member of the SG) and C. Kirk who was never a member. Prior to our resignations, 2 votes were cast immediately agreeing with the Chairman, one of which was the Parish Clerk, who was not a member of the SG. The ongoing inclusion of K. Barker and C. Kirk to SG emails was a mystery and was challenged but no explanation or change occurred, despite the Chairman having on

several previous occasions cautioned the SG not to divulge NP business to anyone outside the Group.

Point **1I**, we have already submitted our account of the first sight of the new SEA at the end of October and our subsequent work on the amendments to the errors in the document. This did not get resolved before we resigned. Is this section saying that the SG, which at our resignation consisted of A. Goodman, J. Deighton, L. Thirkettle and possibly M. Cottis, were consulted before the final draft was submitted to AECOM? The only member there besides AG who had knowledge of the evolution of the Plan, its Objectives and Policies, and who were included in relevant historical meetings was Julia, who at the time of our resignations had excused herself from the team due to health issues. This leaves AG, LT and possibly MC to review the second SEA. LT and MC were brought onto the team unilaterally by AG at the end of 2023.

We have already put forward in our previous statement that there was no consultation, discussion or warning of a new and different SEA. We have already submitted the only emails referencing this from AG to the team and the comment made to the PC saying that the changes were minor and did not change 'the broad direction' of the plan. Additionally, and crucially, no policies to our knowledge, had been changed.

The points up to part **1.2.3** have all been addressed previously by our statement and we do not feel further comment is required.

Points **1.2.3** to **1.2.4** are disingenuous. Sites were not reduced by transparent means consulted on within the Steering Group. The removal of sites 2, 3 and 4 have still not been justified. We know the owner of site 2 was not Tricker and Last at the time that 'the owner' allegedly withdrew the site. We know that site 3 until late in 2024 was still included in the Plan and no evidence has been provided that the owner withdrew it. Site 4, the Residents preferred site, the Steering Group's preferred site, the site scoring highest on the HELAA table and in the 2023 SEA, has been removed through stealth. A planning application (2019/1691) was submitted in the early days of the NP. This was discussed by the Steering Group and whilst not everyone agreed, it was decided that because the site was a prime site for inclusion in the NP for development, we should object to the planning application. How can the latest decisions be so far now from the original intention that the most appropriate and voted for site has been removed completely? It is true to say, in our opinion, a fundamental change occurred in the direction of the NP in favour of site 1, seemingly since Regulation 14.

Regarding '**The link between the two SEAs**', this is just repetition of the process and the presented table tells us nothing. The use of the same 'framework' is totally irrelevant, the crux of the matter is the changed content, not the format in which it is presented.

Points **1.2.3, 3a to 3c** appear to contradict what has previously been asserted by AG about option 1 (site 1,18,N2) and option 2 (site 2,4,N3). He refers to the second SEA and site 2, (the Chenery site allegedly removed by the owner from the first SEA but now included again in the second SEA). Point **3b** confuses the options and sites again, but in any case A. Goodman refers to SEA 1 and SEA 2 saying that ***'At this stage the NP team were prepared to offer the housing solution to the 2 sites (10 on the brown field site in option 2 and 15 on the green field site on option 1 of SEA 2)'***. This is clearly not the case, since in the July 2022 PC meeting, prior to the second SEA, he asserted that the 'PC wanted' all housing on site 1. Point **3c** ***'The sites were reduced again to a single site after the withdrawal of the option 2 site (SEA 2 and SEA 1).'*** Withdrawing option 2 not only removed site 2 but also site 4 with no sound reasoning, although it had already been discounted, allegedly, by the 'PC', in July 2022 when 'they' proposed that site 1 should take all housing.

The whole of the section at **1.2.4** we refute. We particularly take issue with the opinion that 'some may have been confused'. There was no confusion on our part. The confusion lies with the hand that prepared the 2024 October version of the SEA, which if not checked by us would have been a complete travesty. In this paragraph headed ***'The confusion'***, the sentence ***'The second SEA, to reduce the number of options, groups sites into geographical areas and identifies each area as an option. Thus enabling the NP team to whittle down the geographical areas and therefore the number of sites.'*** claims to have ***'enabled the NP team to whittle down....'*** As we have already established, the NP team were never involved in this exercise.

Section 3: The letter from AECOM

We suggest this is not credible or material. It is merely an explanation of the process applied by AECOM in assessing sites and has no merit.

It states that ***'the SEA does not select sites for consideration'***. This is not in dispute. The SG chose the sites and then the QB were there to ratify the decisions. The new changes to sites i.e. removal of previous sites and introduction of new sites, were essentially instructions from AG, not from the SG, as we know they were never consulted in this new SEA.

Furthermore, in point **1** they state that ***'the process to arrive at reasonable alternatives was repeated in 2024 considering updated evidence and consultation feedback'***. We suggest the 'updated evidence' was only the change of sites and objectives wording, the consultation feedback must be non-existent since there was no consultation.....just what consultation feedback are they referring to? Additionally, there was never any discussion

in the SG after Regulation 14 about the South Norfolk comments regarding sites 8 and 10. The SG's position was, and remained, that the Settlement Gaps were a desired objective and valued by the residents and would remain in the Plan. The only concession to SN's comments was a reduction in the overall reach of the Settlement Gap in question, which to us had always been far too big and pointless anyway.

In Point **2** the information is incorrect. They say **'Site 3 could no longer be confirmed by the QB as available over the plan period'**. It was site 19 that was claimed to be unavailable over the plan period, but this is still to be verified. Site 3 had allegedly been withdrawn by the owner, which is also still to be verified. These points presumably were fed to AECOM by AG, but AECOM could have checked the facts by reference to the copious information available before the Hearing.

The last sentence of the following paragraph is not correct either, they have not **'highlighted the merits and constraints associated with the sites in these locations'**. There has been no consideration of the issues associated with these sites. At least some of which are: the Settlement Gap, the traffic on Rectory Road/Harleston Road, the flooding on Rectory Road/Harleston Road, the one track country lanes, now 'Quiet Lanes', of Harvey Lane/Rectory Lane, the proximity of Grade II listed buildings and their settings (deemed mentionable on the Ipswich Road sites), the viable agricultural land they occupy. None of these findings have **'fed into plan and decision making (undertaken by the Qualifying Body)'**. The plan was signed off in July by the QB without the new SEA, or on the face of it, their knowledge of the revised content of a second SEA, so how have the QB undertaken decision making. If any assertion is made this was done in December after the SEA was corrected, then even if that were the case, it is disingenuous and was only done retrospectively.

The next paragraph repeats the points already made about sites 3 and 19. No justification for site 19 has been provided and as we said in our previous statement, this could presumably be said about any and all sites. Site 3 did not **'fall away'** after Regulation 14 and at the risk of repeating ourselves numerous times, was a site under consideration until late 2024.

We contend that the AECOM report 2024 version was largely drafted by the NP Chairman, whether, and to what extent the Consultant was involved, should be investigated (title page shows 'First Draft by AG/RL'). The nature and number of the errors in the first version produced in October speaks volumes. If some kind of survey or verification exercise had taken place by AECOM then many of the errors would have been flushed out by them. In addition, the SG were never informed by Rachel Leggett that a new SEA was being prepared, which we feel sure she would have mentioned if she was involved in a rewrite and had any inkling that it was not a team effort, unless of course she was told that the SG

had made the decisions. At no time did this get discussed in the numerous meetings and correspondence between the SG and Rachel when trying to refine the Plan for submission in the latter part of 2024. First mention of this by her was when she questioned its delivery time, late in 2024.

There appears to have been no **independent** input by AECOM nor any attempt to verify the information they were being given. We are aware that there is a disclaimer in the AECOM document, but of what value are they if they add nothing to the exercise? They may as well just provide a template. In addition, if the writer of the AECOM letter does not know that the Qualifying Body is not the Steering Group, then there can be no confidence in the letter writer's input to the document, in our opinion.

Regarding establishing the alternatives, and whilst accepting our shortcomings in not realising that these carry no planning weight, we would refer to the section in the October 2024 SEA paragraph 3.2.4. which references the key plan objective of separation of nucleated settlements. Appended is an extract from South Norfolk's scoping report (see Appendix 5) of March 2022 which clearly states that the reasonable alternatives should be fed back to the Steering Group for consideration. In that case why weren't the new reasonable alternatives shared with the Steering Group and considered by them?

The explanation put forward for a new SEA cites the input from South Norfolk. We have referred to this earlier in this section. Their comments were known mid 2023 and as we have said, in no discussions/meetings that we were party to (and we have only ever missed one SG meeting) was there any intention to change the agreed sites as a result of their comments. On the 8th July 2024 A. Goodman wrote with objections to South Norfolk on a proposed development on site 8. Policy criteria i.e. Settlement Gap, was cited as one of the justifications. Regarding site 10, AG's own submitted correspondence with IS demonstrates the strength of feeling about site 10 and its constraints, yet he put this forward in the new SEA as a reasonable alternative.

We have already highlighted in our statement that no discussion with the NP team was entered into informing them that the content of the Plan had changed so significantly that a new, essentially different, SEA was required. Quite the opposite in fact, as supported by our comments in our previous statement. In addition, South Norfolk's comment is only in respect of sites 8 and 10, as these would not impact the Settlement Gap. They make no comment on sites 11,13 and 14 which **do** impact on the Gap, but these have been included in the SEA anyway. The SG did, however, acknowledge South Norfolk's concern over the size of the original gap and this was considerably reduced at the end of 2024 in consultation with Rachel Leggett. The Settlement Gap to the North of the village by comparison grew and was reinforced by a cordon sanitaire and 4 Local Gaps!

And whilst on the subject of ludicrous gaps, we have previously mentioned and appended the email response to our questioning, whilst in the SG, the extent of the Local Gap on Rectory Road which we always understood to be the 10m gap between the houses. The response from AG highlights his annoyance that someone on the team took the time to read the new SEA. It underlines the inappropriateness of the NP Chairman's 'guiding' of the way he wished the decisions to go. It also reflects the NP/PC Chairman's proposal to the PC that the 10 houses from the Chenery site be given to La Ronde. This email clearly leads the voting in declaring the way he was voting. The email also demonstrates the typical retaliation from the Chairman upon any debate of the content of the Plan. He became increasingly hostile during 2024 as meetings (lasting several hours), supported by numerous clarifying emails going to and fro on a regular basis occurred. These meetings and emails were trying to address pages of unnecessary content in the NP in an attempt to wrestle the Plan into a state worthy of submission. As late as mid 2024 the Plan was over 300 pages long.

Regarding the document submitted by the PC (post hearing) and attached to the email from Richard Squires dated 24.10.25. We take this, as submitted, to demonstrate public consultation, however, this merely shows consultation prior to and at Regulation 14, which we have no dispute with. The references to resident's comments on pages 195, 199 and 200 appear not to support the choice of site 1 so we do not understand what exactly is being suggested by this submission, or what it is proving. There is nothing in the document to support public consultation of the change of reasonable alternatives post Regulation 14, and the withdrawal of sites 2, 3, 4 and 19, which is the issue here.

We reiterate that we have only ever sought to, and worked towards, getting the plan through regulation 16. Numerous attempts were made to resolve the issues before we resigned, and after, but even then, still before submission at Regulation 16. See our resignation letters, the question raised at the December PC meeting and a final attempt on the 14th November 2024 (see Appendix 6), just before our resignations.

As a final footnote to this, we apologise if we appear to be irritated and annoyed, but we are. We have become increasingly exasperated. After 7 years of dedication to the Plan, the whole process has latterly been, and still is, stressful. To still be embroiled in it is regrettable but we want to finish what we started and see a fair outcome for the village reflecting the residents' wishes. If we can achieve this then the last 7 years and our resignations will not have been wasted.

MINUTES FOR MEETING OF DICKLEBURGH & RUSHALL NEIGHBOURHOOD TEAM

Thursday 17th JUNE 2021 Zoom

SITE ASSESSMENTS

Zoom 7.00pm – 7.30

Attendees:

AG, RH, JP, AP, AE, MH, AW,

Thoughts sent in by JD, AB

Purpose of the meeting: To assess the sites put forward through the GNLP process

Start Time: 7.00 pm

End time: 7.30 pm

1. To review the site allocation in light of the GNLP village clusters
2. To consider the allocation of sites in light of officer guidance (R. Squires email)
3. To consider the sites in relation to the HEELA
4. To consider the sites in relation to NP policies
5. To consider the sites in relation to Survey outcomes
6. To consider sites in relation to map.
7. To consider numbers in relation to school data.
8. To consider new proposal.

Support materials:

NP section 8

GNLP sites map

HEELA

Outcome

Chenery as a green field site are extremely likely to get planning permission should the site be put forward independent of the Neighbourhood Plan.

La Ronde already have outlined planning permission for 22 homes.

It is therefore decided that the number of houses coming forward in the parish of Dickleburgh and Rushall through the Neighbourhood Plan should be no more than 25.

Distribution of the 25 homes.

Site 1 to come forward as the preferred site with permission to build 15 houses. All aspects of the NP and all concerns must be addressed. Chenery site. Current brown field site (the garage) to be extended to include site X. Site to come

forward as a preferred site with permission to build 10 houses. Proviso. Should the developer deem this to be unachievable then the extended site will be withdrawn.

Ipswich road site

This site is considered significantly important as it is the significant run into the village. It has aspects of the original High common entrance, it stands as a reference to the 2 listed buildings on the Ipswich road and provides context to them and their setting.

Should the Chenery site developer reject the offer. The NP team will enter consultation with the owner of the Ipswich Road site and the extended site offer will be withdrawn.

All decisions were unanimous

Post meeting: Chenery withdrew from the process. Building will not be permitted on the extended

Appendix 2 – Parish Council minutes (excerpt) 12.07.2021

- 84. NEIGHBOURHOOD PLAN** - Cllr. Goodman reported that the Neighbourhood Team – had sent the plan to SNC /Broadland – a response received contained advice, questions, further endorsement of areas, and some significant re-writing. This copy will then be resent to SNC for scrutiny.
2. Sites – as part of the GDPR Village Clusters group 25 homes are required by all Parishes with a primary school, these should be delivered during the life of the NP, there are outstanding permissions for La Ronde for 22. By 2042 the total will be 47 - two sites have been identified: a further La Ronde site – 15 homes on Chapel site, and the Chenery site for 10 homes. The owners of the Chenery site have rejected the offer. At this stage it is difficult to determine which of these three sites will pick up the final allocation and be built – La Ronde site, or on the north and south side on Ipswich Rd. The Neighbourhood Team will meet using the HELAA criteria to determine which site are most suitable.

Appendix 3 – Parish Council minutes 18.10.2021

Dear all

Following the last meeting of the NP team it was agreed that:

The NP team would go for the minimum number of houses to be built - 25.

(This does not include the 22 already allocated by South Norfolk that have prior planning approval.)

The allocation was

15 to La Ronde on site 18

10 to Tricker and Last on the Chenery site.

The proviso was that should Tricker and Last say 10 was unviable - the offer would be rescinded and the offer made to the owners of the site on the Ipswich Road opposite the listed buildings and beside the Old police station.

The NP team decision went before the Parish Council for their support. The Parish Council thanked the NP team for all their hard and diligent work and requested that we reconsider the option should the Chenery site be unviable. If T and Last reject the offer, the PC would like the offer to be made to La Ronde to build all 25 houses.

I spoke to Tricker and Last and made them the offer explaining this was a "sounding out" conversation and a formal offer would only be made if they confirmed they would accept it and build to the specifications of the NP and the site specific concerns expressed by the NP team. Tricker and Last are talking to the land owners to see if they will accept the offer. I await their reply.

Ann and I spoke to La Ronde. La Ronde have agreed they will build on a carbon neutral basis. In that they will assess the carbon emissions of the whole build and compensate to that number not just the building of the homes. They have accepted the offer of the 15 homes but do have capacity to deliver the whole 25. They are also looking at the Quiet Lanes initiative to see if they can incorporate the ideas and styling into their development plan.

Should T and Last refuse the offer, my personal view is that we should go back to La Ronde and offer them the additional 10 houses. This would show the PC that we are listening to their concerns and thinking strategically about the look and feel of the village of Dickleburgh and Parish as a whole.

One of the reasons we chose the Ipswich Road site was that this was the preferred site of residents when the Hopkins homes development was proposed. However the survey had all 4 sites (2 on Ipswich Road, Chenery and La Ronde) as almost the same so we would still be meeting the wishes of the residents.

I would be happy to organise a meeting in the Village Centre should we wish to have one, alternatively we could utilise email. Unfortunately the PC does not have zoom anymore.

Finally La Ronde have offered free training at the Village Centre on planning and delivering the La Ronde site in a way that we would wish it incorporating our Design Code and the latest NPPF requirements.

Any thoughts?

Andrew.

Appendix 4 – Andrew Goodman email re. Local Gap B

Local Gap B



Andrew,
D

This is the local gap drawn in the document for last week's meeting when we highlighted a couple of map faults in the NP. This reflects the gap as drawn in the various latter stages of the Plan.

Agree that on some earlier documents the gap erroneously showed an area behind the houses at the top (extreme east) of Rectory Road which was corrected.

We've never shown this gap running right down to the stream at the bottom of New House Farm, as far as I can remember, if that's what you are getting at?

This gap on this diagram reflects the discussions we had in those final meetings with Rachel.

Jackie

Dickleburgh and Rushall NP Local Gap B - decision needed

Dear all

I realise we all thought the NP was put to bed - well it was, but a problem has arisen. By reading the SEA Alan and Jackie noticed the LG B was wrong. When we went back to the NP we realised the SEA was in fact correct in that it reflected accurately the NP, but it was the NP that was wrong.

The current image of the LG B does not reflect the groups understanding of the Local Gap.

Local Gaps

Local Gaps can occur inside settlements (this one does). They serve to create spaces and restrict development within the Local Gap. In this instance Local Gap B protects views north from within the settlement, protects against flooding as it allows water to flow north from Rectory Road toward the lowest point in the parish - the moor where all water should eventually end up. It stops settlement and allows water to be absorbed by the area of the Local Gap.

I need your views. I am recommending Local Gap B is, as below, without the Yellow line. VOTE A. The alternative is that it becomes the thin strip using the Yellow line as the boundary. VOTE B.

The third choice is a composite of the 2 see below this image to the next image. VOTE C.

My vote is A I need your vote.

Thank you for your time.

Andrew



Subsequent stages for the SEA process

- 11.1 The next stage will involve identifying and appraising reasonable alternatives for the Neighbourhood Plan. The findings of this work will be fed back to the Steering Group so that they might be considered when preparing the draft plan.
- 11.2 Once the draft 'pre-submission' plan has been prepared by the Neighbourhood Plan Steering Group, it will be appraised, and the Environmental Report prepared for consultation alongside it.
- 11.3 Consultation responses will be considered in finalising the Plan and SEA. Following subsequent submission of a finalised Plan to South Norfolk Council, and further consultation, the Neighbourhood Plan and accompanying SEA will be put forward for Independent Examination.

Appendix 6 - Jackie Patching email to Andrew Goodman, re. sites

Andrew,

Your e mail to Rachel refers.

The table in Section 8 is, as the five of us have already agreed, incorrect but it surely should be amended, not removed. The table erroneously refers to site 3 as the brownfield site and not capable of taking 25 homes. It also says site 4 has been rejected. Site 3 is greenfield, it is one of the villages preferred sites, it is the field that was until recently, being proposed by you as a green space, until the owner refused to agree to this. Site 2 is the brownfield site we refer to as Chenery's and has not been rejected. As the five of us have agreed, the land agent merely withdrew the proposed development because he was told that his requested number of houses would not be permitted. The site remains one of the preferred sites. Site 4 is the large area on the west of Ipswich Road. This has not been rejected. It is one of our preferred sites. If any of this is now in dispute then why have the Steering Group and the village residents not been consulted?

Further to this, I would like to raise the following question

Has the new SEA been prompted by these erroneous site changes? See the wording from the latest draft of the NP below:

8.6 Note that the options considered in the SEA were not fully aligned with the sites assessed by the Neighbourhood Planning Committee.

Table X: TITLE?

Site #	Description	Vote		Decision
		Yes	No/ Undecided	
1	West of Norwich Road	8	1	Agreed proposed site.
2	East of Ipswich Road	5	4	Rejected.
3	West of Ipswich Road (brownfield only)	9	0	Site unable to deliver the 25 homes and then
				withdrawn by developer. Rejected as it is not a viable site.
4	West of Ipswich Road (greenfield site)	0	9	Rejected.

The statement at 8.6 above, in my opinion, is incorrect. The original SEA addressed the sites as agreed by the Steering Group prior to regulation 14 and unamended since then until now. It is unfortunate that this was not picked up before but had the Steering Group been included in the evolution of the new SEA this would have been flushed out.

The extract from the SEA guidance (see below) indicates that a new SEA is only necessary and desirable if the Plan is fundamentally changed. I cannot think of any fundamental changes to our policies (which I am assuming are the only other relevant thing here?) but if the new SEA was required because of that, then could we please be advised so that we can also take this into account in our current deliberations.

If it is the change of sites which have prompted the new SEA then we can presumably amend the errors mentioned above, revert to the original SEA and get the plan submitted, albeit with the mistakes which still appear in the Plan amended.

One further point, the table was referred to in the document used as the basis for Thursday's meeting. Why haven't you raised it's removal with us as part of our ongoing discussions?

Full details are set out in [regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004](#).

Paragraph: 040 Reference ID: 11-040-20140306

Revision date: [06 03 2014](#)

Should the environmental report be updated if the draft neighbourhood plan is modified following responses to consultations?

The environmental report will not necessarily have to be amended if the [neighbourhood plan](#) is modified following responses to consultation.

Modifications to the environmental report should be considered only where appropriate and proportionate to the level of change being made to the neighbourhood plan. A change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects. Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects.

Changes that are not significant will not require further environmental assessment work.

Paragraph: 041 Reference ID: 11-041-20140306