

Ref.	Title	First Name	Surname	Position / Dept.	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
RNP01		Phillipa	Nanson	Sustainable Development Officer	Water Management Alliance	General				✓	<p><i>N.B. The following is a summary. Please see submission for complete text.</i></p> <p>Rackheath falls partially within the Internal Drainage District (IDD) of the Norfolk Rivers Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any development within the Board's area.</p> <p>I note that a number of developments have been identified within the Greater Norwich Local Plan, including land in North Rackheath (allocation of 4150 houses), and site references GNLPO172 (allocation of 205 dwellings) and GNLPO351 (allocation of 15 dwellings). While these developments have not been allocated within your neighbourhood plan, in order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where developments are proposed within or partially within a Board's IDD, please be aware of the following:</p> <ul style="list-style-type: none"> - Byelaw 3- Discharge of Surface Water into the Board's District - Byelaw 3- Discharge of Treated Foul Water into the Board's District - Byelaw 10- Works within 9m of Board Maintained Watercourse/s - Section 23 of the Land Drainage Act (1991) and Byelaw 4- Alterations Proposed to a Watercourse
RNP02	Mr	Steve	Hickling	Environment Officer	Norfolk Historic Environment Record	General				✓	<p>Historic England's published guidance on the preparation of Neighbourhood Plans (https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/) encourages the full consideration of heritage assets and suggests ways in which this can be achieved.</p> <p>Based on this guidance, we would like to suggest the authors of the plan follow a number of steps:</p> <ol style="list-style-type: none"> 1. Study Historic England's published guidance and consider how the plan can take its advice on board. 2. Contact the Norfolk Historic Environment Record and request information on heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk. 3. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration. <p>I note that the draft plan does not really mention buried archaeological remains at present. Consulting the county Historic Environment Record could produce more monuments which you may want to include in your list of Local Heritage Assets.</p> <p>They may also want to include a statement saying that this office will issue advice on any required archaeological mitigation for new developments which may have an adverse impact.</p>
RNP03	Mr	Jerry	Dunham			Housing and Spatial Strategy (Section 2.14)		✓			<p>I support the overall direction of the Neighbourhood Plan, particularly the position that no further housing allocations are required beyond those already identified (e.g. GT16 North Rackheath).</p> <p>However, I wish to emphasise the importance of protecting the rural buffer between Rackheath and Salhouse, especially along Norwich Road. As a resident of Salhouse, I am concerned about any potential future development proposals that would extend Rackheath's built up area in the direction of Salhouse.</p> <p>The Plan rightly identifies that the housing need has already been met and that retention of unallocated greenfield land is paramount. This principle should be safeguarded firmly through the plan period to avoid coalescence between communities and preserve the rural character of both Rackheath and Salhouse.</p> <p>I respectfully request that this commitment is reinforced in the Plan to avoid ambiguity, and that any development that risks closing the gap towards Salhouse be explicitly resisted.</p>
RNP04		Julie	Cullis		Norfolk Wildlife Trust	6.2 Policies: Environment and Landscape	✓				<p>S6.2.3 We welcome inclusion of Gazebo Farm County Wildlife Site (CWS) in this section (page 33-34). We also welcome reference to the large areas of deciduous woodland Priority Habitat in S6.2.4, on page 34.</p>
RNP05		Julie	Cullis		Norfolk Wildlife Trust	Policy ENV1: Fresh water supply and drainage	✓				<p>We acknowledge that sections i. and ii. have been amalgamated so that the words 'rainwater' and 'harvesting' are together in the same section (rainwater harvesting).</p>
RNP06		Julie	Cullis		Norfolk Wildlife Trust	ENV3: Biodiversity, tree belts and wildlife habitats				✓	<p>Given the pressures facing biodiversity, we particularly welcome the wording that 'optimally a 20 per cent net gain is encouraged' and that this is not just on intensively farmed land as referenced in the previous draft.</p> <p>County Wildlife Sites (CWS) are areas of land rich in wildlife but outside of the statutory designated sites. To ensure that this policy is robust we therefore recommend a minor amendment to the first paragraph to specifically include County Wildlife Sites (CWS) and also Priority Habitats in addition to the existing wording.</p> <p>We note and welcome the addition of policy wording on green roofs/walls as these can 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, whilst adding aesthetic value to spaces.</p> <p>We appreciate the consideration given to wildlife and the natural environment with the preparation of this Neighbourhood Plan and acknowledge and welcome the amendments made in response to our previous comments.</p>

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RNP07		Julie	Cullis		Norfolk Wildlife Trust	Policy ENV4: Landscape buffers		✓			<p>We welcome the additional wording, 'Buffer zones should be considered and encouraged around sensitive wildlife sites, where appropriate, and where this will provide ecological benefits.'</p> <p>Natural green screens use living plants to absorb pollutants from the air, therefore purifying the air but also providing a habitat for birds and insects, increasing local biodiversity whilst providing natural sound dampening and a natural aesthetic appeal. We therefore welcome the addition of green screens to the first paragraph. We recommend just clarifying that these will be 'living green screens'. Living green screens will provide ecological benefits using living plants, rather than artificial green screens which use artificial foliage.</p>
RNP08		Julie	Cullis		Norfolk Wildlife Trust	Policy ENV7: Green space	✓				We note and welcome the amendment to the wording at the end of this policy that 'These Local Green Spaces will receive special protection in accordance with national policy', as this is consistent with the NPPF.
RNP09		Julie	Cullis		Norfolk Wildlife Trust	ENV9: Dark Skies	✓				<p>We welcome the following additional wording which will provide more robust protection for wildlife:</p> <p>'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats: (https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/).</p> <p>Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species'</p>
RNP10				Planning Technical Team	Sport England	General				✓	<p><i>N.B. The following is a summary. Please see submission for complete text.</i></p> <p>It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras. 103 and 104. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area.</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.</p>
RNP11	Mr	Philip	Porter	Operations (East)	National Highways	General				✓	<p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
RNP12				Planning	Broadland District Council	General	✓				As stated during its response to the proposed, revised Neighbourhood Plan at the Regulation 14 consultation stage, Broadland District Council is pleased that Rackheath Community Council is keen to ensure the Neighbourhood Plan remains up-to-date and relevant and that it continues to capture the aspirations of the local community, particularly given the progress of significant development proposals within the parish. Taken as a whole, the Council feels that the revisions are valuable and well-considered and that they will continue to ensure that the Neighbourhood Plan is fit-for-purpose over the next several years.
RNP13				Planning	Broadland District Council	Basic Conditions Statement: Appendix 1	✓				<p>This statement sets out the Qualifying Body's position on the significance of the proposed modifications to the Neighbourhood Plan, as required by Regulation 15(1)(f) of the Neighbourhood Planning (General) Regulations 2012 (as amended). Such a statement should set out whether the Qualifying Body considers that the modifications set out in the revised plan are so substantial as to change the nature of the Neighbourhood Plan, giving reasons why it is felt this is the case.</p> <p>Paragraph 1.12 states that Rackheath Community Council, as the Qualifying Body, 'does not believe that the modifications to existing policies nor the introduction of two new policies are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify.'</p> <p>The principal reasons given that seek to justify this statement are that the vision, aims and objectives of the revised Neighbourhood Plan remain the same as those within the adopted plan, with minor amendments to bring them up to date. Policies within the adopted plan have largely been amended, with more detail and justification provided, and none of the original policies have been deleted. There are two new policies, dealing with dark skies and utilities. The revised Neighbourhood Plan does not seek to make any allocations.</p> <p>Broadland District Council agrees with this rationale and supports Rackheath Community Council's opinion that the proposed modifications are not so significant as to change the nature of the adopted Neighbourhood Plan.</p>

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RNP14				Planning	Broadland District Council	Policy HOU1: Design of new development		✓			<p>The Council commented on elements of this policy during the Regulation 14 consultation stage and many of the points made have been addressed. Wording has been amended in point 1 of paragraph 3; however, it is still not entirely clear that the statement achieves what is intended. Is the aim here to focus on the interaction of development at the edges of a site, so that it integrates well? Paragraph 6.1.7 offers good explanatory background, with scope for having varied densities across a site. We consider that point 1 could be worded using similar wording to improve clarity, e.g. 'Designing development layouts so that they seamlessly integrate with existing residential densities adjacent to the scheme', or similar.</p> <p>Point 3 of paragraph 3 states '...does not result in an unacceptable loss of light or overshadowing, or other adverse amenity impacts, including privacy, on existing residents.' What would be deemed 'unacceptable' has not been quantified, so this is open to interpretation. Also, does this include the loss of privacy of garden areas? In addition, there is an issue with the relative nature of the term 'existing residents', given that occupiers of new dwellings surely become existing residents once they move into their homes. It is impractical to ensure complete privacy with development at density and we would suggest that the wording to point 3 is amended to reflect this.</p>
RNP15				Planning	Broadland District Council	Para 6.1.16, Footnote 5		✓			<p>The plan states that NPPF 2024 removes reference to First Homes, but this is incorrect as this tenure is still retained. The most recent version of the NPPF removes reference to Starter Homes as these have been superseded by First Homes. So, it is still correct to retain reference to First Homes in the NP and HNA.</p>
RNP16				Planning	Broadland District Council	Paras. 6.2.10, 6.2.11, 6.2.12 & Policy ENV1: Fresh water supply and drainage		✓			<p>Whilst it is considered acceptable that the Neighbourhood Plan makes reference to wastewater treatment, this is the responsibility of Norfolk County Council. Wastewater policy is exempt from the Town & Country Planning Act 1990 and therefore the Neighbourhood Plan should not include any policy wording which seeks to influence or guide development that is the responsibility of the Minerals and Waste Authority. We note that this is a matter that has already been raised by Norfolk County Council.</p>
RNP17				Planning	Broadland District Council	Policy ENV7: Green Space		✓			<p>As stated during its response to the Reg. 14 consultation response, Broadland District Council has a concern with the first paragraph, which refers to the inclusion of a green space as part of GT16, 'large enough to function as a village green and possibly a cricket pitch, which is centrally located'. Some clarity is required as to whether this is part of or additional to the requirement for a large recreational space within the GT16 allocation. This is because the scale of the GT16 recreational requirement is far in excess of just a cricket pitch. It will be a large recreation ground providing multiple football pitches and cricket pitches along with changing facilities/clubhouse circa 600sqm. This far exceeds the scale of a typical village green and so we would suggest that this character aspiration is revised. Does 'centrally located' mean within the development or within Rackheath? The GT16 site masterplan shows the space on the edge of the development but this is still quite central when considering Rackheath as a whole.</p> <p>As regards the third paragraph of the policy ('Local Green Spaces'), Broadland District Council commented at the Regulation 14 stage that it cannot be assumed that any and all future open spaces secured through development will meet the relevant NPPF criteria and therefore LGS protection cannot automatically be provided. Future LGS designations would need to be undertaken through a further modification to the Neighbourhood Plan. Therefore the Council considers that this first paragraph under 'Local Green Spaces' should be removed.</p>
RNP18				Planning	Broadland District Council	Policy COM2: New play areas and community spaces		✓			<p>As raised by Broadland District Council during the Reg. 14 consultation, care needs to be taken in encouraging parking in the case of 'larger play and park provision' (para. 2). LEAPs and LAPs service local housing development and should not bring additional vehicle traffic. This would go against our sustainability goals. Parking will clearly be needed for the large, formal recreation space and country park delivered as part of GT16, as they will have a wider catchment.</p> <p>As regards the third paragraph of the policy, the Council considers that an element of proportionality needs to be introduced to this requirement – '...developments which are more than 1 mile walk from one of the Local Green Spaces are expected to include smaller areas with play equipment within the open space provision on their site.' What quantity of residential development does the policy apply to in this instance? What constitutes a 'smaller area'? Policy RL1 of the Broadland Development Management DPD does not require developments of less than 5 dwellings to provide recreation space.</p>
RNP19				Planning	Broadland District Council	Policy SER1: School and pre-school provision		✓			<p>The Council commented during the Re. 14 consultation that the design of the secondary school may need to allow for more than two storeys. The wording has been amended to state, that 'school facilities should be designed so as not to dominate the landscape and only be more than 2 storeys high where they are surrounded by sufficient open space to allow their assimilation into the wider landscape.'</p> <p>However, the Council still has concerns that imposing a limitation on 2 storey school facilities in this way will affect the capacity of the land to accommodate the secondary school. Recent high school re-builds in the Greater Norwich area indicate a requirement for 3 storey (minimum) school buildings (incl. Open Academy, Heartsease; City Academy, Earlham; Ormiston Victory, Costessey; Sprowston Academy).</p> <p>The Council considers that this element of the policy needs further amendment to allow for the possibility of a 3 storey secondary school building.</p>
RNP20				Planning	Broadland District Council	Design Guidance & Codes - Figure 32: Suggested widths				✓	<p>This figure has been amended from that within the National Design Code. Within the North Rackheath development, buildings along the spine road will be up to 2.5 storeys due to the width of the road. The main, primary spine road will also include the local centre etc. The Council questions whether it is appropriate to adapt a diagram from the National Design Code in this way.</p>

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RNP21				Planning	Broadland District Council	Design Guidance & Codes - Lighting				✓	The third bullet point in the table states, "Lighting should be attached to buildings where possible". This is generally not well liked by service providers especially on new buildings, so the Council questions whether it will be achievable. It is perhaps more appropriate for a city centre environment, but not necessary in a rural area and it can affect the amenity of the residents.
RNP22				Planning	Broadland District Council	Design Guidance & Codes - D1. Rackheath's street hierarchy				✓	The statement "all public roads must be designed and built to an adoptable highways authority standard" (final bullet point within 'Codes') is unclear. Their status as public roads is a given as they would not be adopted if not built to the standard (and hence would remain private roads).
RNP23				Planning	Broadland District Council	Design Guidance & Codes - D2. Pedestrian and cycling connectivity through Rackheath		✓			The final bullet point under 'Guidance' states "Signage for walking and cycle routes should be clear but not overly intrusive, for example at waist height or painted on the road". The Council is not clear that Regulations would allow this. Some pedestrian/cycle only signs are at the height of normal traffic speed signs, particularly at the beginning of a pedestrian/cycle track on an adopted road, for example. There is a risk that this could result in a lack of visibility (for example, due to parked vehicles obstructing the signs). The Council would suggest adding "...except where reasons of safety dictate otherwise" or similar wording.
RNP24				Planning	Broadland District Council	Design Guidance & Codes - F3. Provision of allotments, orchards and composting		✓			The final bullet point under 'Codes' states "No existing orchards must be lost from Rackheath". The Council questions use of the word 'must'. We would suggest replacing it with 'should' and including the statement, "...unless a replacement orchard of the same size or larger is provided as part of a scheme", or similar.
RNP25				Planning	Broadland District Council	Housing Needs Assessment				✓	The Council notes that the delivery of First Homes at the highest discounted level (50% OMV) may prove unviable and could result in a reduction in the number of homes provided by developers for Affordable Home Ownership.
RNP26					Norfolk & Waveney ICS Estates	General				✓	<i>N.B. The following is a summary. Please see submission for complete text.</i> Overall, the Rackheath Neighbourhood Plan Review provides a good foundation for managing the anticipated population growth. However, by strategically allowing and utilising CIL funding for healthcare purposes, we can ensure that healthcare infrastructure keeps pace with the community's needs, providing high-quality, accessible healthcare services for all residents. The ICS would welcome the Rackheath Parish Councils support in ensuring suitable and sustainable provision of healthcare services across all health sectors for the residents in the plan area through the utilisation of local CIL (community infrastructure levy) developer contributions as and when improvements to healthcare capacity are required. It is essential that the ICS Estates team and the Parish Council work collaboratively with local authorities, developers, and healthcare providers to ensure that healthcare remains a priority in the planning and development process, if unmitigated the impact of future development on healthcare would be unsustainable including that of Primary care, Community care, Mental Health care, Acute care and the Ambulance service.
RNP27		Debbie	Mack	Planning Advisor	Historic England	Policy ENV5: Local landscape and local heritage assets		✓			We welcome the references to the historic environment throughout the draft Plan. In particular we welcome the identification of non-designated heritage assets (Local Heritage Assets) through the Neighbourhood Plan. We welcome the evidence base for this in appendix 3 and use of the Historic England selection criteria in this process. We recommend that it would be helpful for the Plan to also use the NPPF term non-designated heritage assets. We welcome figures 24 showing listed buildings and figure 25 showing Local Heritage Assets. Policy ENV5 on Local Landscape and Local Heritage Assets sets out a framework for proposals affecting heritage assets which is welcomed. We note that the tests for designated heritage assets are not set out in this policy – are you relying on the Local Plan policy and NPPF for these?
RNP28		Debbie	Mack	Planning Advisor	Historic England	Policy ENV6: Views and vistas across the parish	✓				We welcome Policy ENV6 relating to views and vistas across the parish.
RNP29		Debbie	Mack	Planning Advisor	Historic England	Appendix 3: Description of local heritage assets		✓			In appendix 3 under asset 12, we note the phrase 'Area identified by Historic England' is used twice. We would be interested to understand where this comes from. Historic England referred to this parcel of land in our representations on the Greater Norwich Local Plan, but we did not specifically 'identify' that land ourselves as part of that process. We were simply making the point that the footnote to the proposed draft allocation, in which the Council stated that the land to the west was only suitable for open space, should be incorporated into the policy itself. Therefore, we advise that it might be appropriate to remove the phrase 'Area identified by Historic England' and use some alternative wording.
RNP30		Debbie	Mack	Planning Advisor	Historic England	Design Guidance & Codes		✓			We welcome the preparation of the Rackheath Design Guidance and Codes and make the following comments: We welcome the references to heritage assets throughout the guidance/codes. P46 Historic England welcomes SuDS. The design code should advise that they must be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS. Therefore, you should include an additional bullet point at E.4 to read 'SuDS must be designed to avoid impacts on archaeology'.

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RNP31		Debbie	Mack	Planning Advisor	Historic England	General				✓	We would refer you also to any comments made at Regulation 14 stage, as well for general advice to our detailed guidance 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/ .
RNP32		Sally	Wintle	Consultations Team	Natural England	General				✓	<i>N.B. The following is a summary. Please see submission for complete text.</i> Natural England does not have any specific comments on this draft neighbourhood plan.
RNP33				Lead Local Flood Authority	Norfolk County Council	Policy ENV1: Fresh water supply and drainage		✓			<i>N.B. The following is a summary. Please see submission for complete text.</i> The LLFA particularly welcomes the inclusion of Policy ENV1: Fresh Water Supply and Drainage and its enhancement from the policy included within the current Neighbourhood Plan, along with its supporting text in respect of flood risk and references made in the document to the need for consideration of flood risk in future developments, the implications of climate change, and identifying areas within Rackheath which have been affected by localised surface water flooding (Figures 9, 16 and 17). As noted in our Regulation 14 response, the LLFA would welcome references be included within the document to ensuring new developments gives adequate and proportional consideration to their likely effect on all sources of flooding and supported with relevant mapping. Furthermore, as part of Parish lies within the Norfolk Rivers Internal Drainage Board, and it would therefore be beneficial identify these areas in the mapping.
RNP34				Lead Local Flood Authority	Norfolk County Council	Objective 3 - supporting text; Policies ENV1 and ENV2		✓			The LLFA further welcomes references made in the document within Objective 3, Policy ENV1: Fresh Water Supply and Drainage and Policy ENV2: Climate Change, to the use of Sustainable Drainage Systems (SuDS) within developments, including what the SuDS approach involves, the benefits derived from its inclusion and examples of SuDS features such as swales and permeable paving. As noted in our Regulation 14 response, the LLFA consider that this policy could be further enhanced by reference made to the four pillars of SuDS, namely water quality, water quantity, amenity and biodiversity but welcome that SuDS is now included within the Glossary section of the document in Appendix 4. The LLFA further welcome reference made in the document to the availability and need to consider guidance from relevant Agencies in respect of flood risk management, drainage and flooding matters such as the Norfolk County Council LLFA and the Internal Drainage Board. The LLFA note reference to the Community Council made within the final paragraph of Policy ENV1 and Policy ENV2 which we believe may be an error and should possibly read 'County Council'.
RNP35				Lead Local Flood Authority	Norfolk County Council	General				✓	<i>N.B. The following is a summary. Please see submission for complete text.</i> The LLFA welcomes the document's reference to guidance from relevant agencies like Norfolk County Council LLFA and the Internal Drainage Board on flood risk and drainage. The LLFA note reference to the Community Council made within the final paragraph of Policy ENV1 and Policy ENV2 which we believe may be an error and should possibly read 'County Council'. The LLFA recommends explicitly referencing the Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 7.3 (April 2025) in the Neighbourhood Plan, particularly for surface water risk and drainage on proposed development sites. The LLFA appreciates that the Rackheath Neighbourhood Plan aligns with strategic policies in the Greater Norwich Local Plan and the National Planning Policy Framework (NPPF). The LLFA are aware of AW DG5 records within the Parish of Rackheath, however, this will need to be confirmed with/by Anglian Water. The LLFA notes 10 records of internal flooding and 26 anecdotal external flooding incidents in Rackheath since 2011. Anglian Water DG5 records exist for the parish but need confirmation from Anglian Water. The LLFA note that some flood risk mapping has been included in the document. The LLFA recommend that mapping be provided for all sources of flooding, with any mapping covering the entirety of the Neighbourhood Plan Area.
RNP36				Lead Local Flood Authority	Norfolk County Council	Policy ENV7: Green Space				✓	As was the case in the Regulation 14 document, it is noted that the revised Neighbourhood Plan proposes 9 no. Local Green Spaces which are identified in Policy ENV7: Green Space and Figure 27. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.

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RNP37				Minerals & Waste	Norfolk County Council	Paras. 6.2.10, 6.2.11, 6.2.12 & Policy ENV1: Fresh water supply and drainage; para. 6.4.5			✓		<p><i>N.B. The following is a summary. Please see submission for complete text.</i></p> <p>The Rackheath NPR does not meet the basic conditions test because it contains excluded development. The Basic Conditions Statement submitted with the Rackheath NPR states on pages 3 and 4 that the Rackheath NPR policies do not relate to excluded development and that the Rackheath NPR does not deal with County Matters. Unfortunately, these statements are incorrect. <u>Paragraphs 6.2.10, 6.2.11 and 6.2.12</u> contain detailed information about WWTWs, odour emissions, odour control and design. Waste Water Treatment Works are waste management facilities and County Matters development, which are therefore excluded development from neighbourhood plans and cannot be included within neighbourhood plans. We object to the inclusion of paragraphs 6.2.10, 6.2.11 and 6.2.12 in the Rackheath NPR and they must be deleted in order for the plan to meet the basic conditions test. <u>Policy ENV1: fresh water supply and drainage</u> - we object to the following text being included within policy ENV1 (page 38) because it is regarding excluded development: "Any wastewater treatment plant included in a development proposal must be fully enclosed and of the highest specification such that there is no odour detectable in any nearby dwelling, commercial space or community facility, either inside or outside." This text must be deleted from the Neighbourhood Plan because wastewater treatment plants are County Matters and are excluded development from Neighbourhood Plans. We raised the same objection to Policy ENV1 during the Regulation 14 consultation in January 2025, but the text still remains. <u>Business and employment: paragraph 6.4.5</u> - we object to the references to incineration, hazardous waste and landfill within paragraph 6.4.5. References to waste management facilities must be deleted from paragraph 6.4.5 because waste management facilities are County Matters and are excluded development from Neighbourhood Plans. The same objection was raised during Regulation 14 consultation.</p>
RNP38				Minerals & Waste	Norfolk County Council	Para. 6.4.11		✓			<p>Buffers between residential and industrial uses: supporting text to Policy BUS2 - we advise that the information on the 'agent of change' principle in the NPPF, which is included at the end of paragraph 6.4.11, should be moved to the end of paragraph 6.4.10 instead because it relates to the impact of new developments on existing developments and does not directly relate to retail provision and a centre to Rackheath as discussed in paragraph 6.4.11.</p>
RNP39				Highway Authority	Norfolk County Council	Policy ENV7: Green space			✓		<p>The Highway Authority has the following comments to make on the local green space (LGS) designations:</p> <p>A. Newmman Woods – Objection. Individual proposed green space allocation plan needed.</p> <p>B. Jubilee Park – No objection.</p> <p>C. Stracey Sports Park – No objection.</p> <p>D. The Landings – Objection. Individual proposed green space allocation plan needed.</p> <p>E. Princes Park – Objection– Grassed area contains underground highway surface water soakaways which will require ongoing future maintenance.</p> <p>F. Liberty Park – Objection. Drainage features</p> <p>G. Wendover Park - Objection. Individual proposed green space allocation plan needed.</p> <p>H. Trinity Meadow – Objection – Grassed area contains underground highway surface water soakaways which will require ongoing future maintenance.</p> <p>I. The community park to be delivered as part of the GT16 North Rackheath development, at the northern end of the site - Objection. This should not be designated as a green space as the site does not have planning permission.</p> <p>The objections to LGS A, D, E, F, G, H are justified as LGS designations must not impede with the duties/functions of the County Council, these LGS designations are on highway land and the LGS designations could impede the Highway Authority's ability to fulfil its statutory duties with regard to highway improvements, management and maintenance.</p>
RNP40				Highway Authority	Norfolk County Council	Policy TRA3: Layout and traffic calming			✓		<p>There are a number of suggested Transport and Access policies. Whilst the majority of these policies align with the view of the Highway Authority. The Highway Authority objects to paragraph 4 of Policy TRA3 which states "There should be more than one route in and out of major or large estate scale developments and for all commercial developments of more than 1 hectare". One hectare can typically accommodate around 35 dwellings. The Highway Authority would not necessarily require a second point of access on a development until around the provision of 80 dwellings or more. Therefore, paragraph 4 of Policy TRA3 is required to be deleted.</p>
RNP41		Carry	Murphy		Anglian Water	General				✓	<p>Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the Rackheath neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes. I can confirm, Anglian Water has no further comments to make.</p>
RNP42	Mr	Alasdair	Hain-Cole	Planning Officer	Environment Agency		✓				<p>Thank you for consulting us on the draft revised Rackheath Neighbourhood Plan. As set out in our response to the November 2024 pre-submission draft, we have few concerns given the Greater Norwich Local Plan was recently adopted in 2024 and the proposed Neighbourhood Plan does not allocate additional development. Our previous response also highlighted potential capacity issues at Whitlingham Waste Water Treatment Works and stated our support for Policy ENV1, which requires a foul drainage strategy to be submitted in support of new major or large estate scale developments at the planning application stage. We would like to reiterate our support for this policy.</p>