

Ref.	Title	First Name	Surname	Position / Dept.	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
SNP01	Mr	Philip	Porter	Assistant Spatial Planner	National Highways	Whole Plan				Y	No Comment
SNP02	Miss	Lucy	Fielder	Planning Advisor	Environment Agency	Whole Plan				Y	Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.
SNP03		Penny	Turner	Designing Out Crime Officer	Norfolk Constabulary	Whole Plan				Y	The following is a summary: In terms of creating and maintaining safer communities, there are a number of measures that should be included in the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area; 1. The Neighbourhood Plan should include the specific objective to 'create and maintain a safer community and reduce crime and disorder'. 2. The Neighbourhood Plan should clearly support the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for anti-social behaviour. The Neighbourhood Plan should include a policy 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 the objective to 'create and maintain a safer community and reduce crime and disorder'. 3. The Neighbourhood Plan should include clear reference to the use of developer contributions and / or CIL monies to deliver local initiatives that create safer communities (and reduce crime). This should include measures identified by Norfolk Constabulary, along with County and District Council's infrastructure studies and infrastructure delivery plans, to contribute to the finance of police / bluelight infrastructure (including premises, vehicles, operational equipment and communication equipment). Expertise in crime prevention processes, products and criminal methodology helps the police fight crime; protect properties, businesses and visitors from unnecessary loss. I recommend Strumpshaw's Neighbourhood Development Plan includes the security principles of deterring, delaying, denying and detecting criminal activity across all strands of development but in particular residential, commercial and recreational/amenity expansion. Designing in good security processes with developers and builders at the outset is essential to combat criminality and its consequences. More detail in the Crime Prevention Through Environmental Design (CPTED) is noted in the full response.
SNP04	Mr	Ross	McGiven	Historic Places Advisor	Historic England	Whole Plan				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/
SNP05		Lorraine	Houseago	Historic Environment Assistant	Norfolk HER	Whole Plan				Y	Thank you for consulting with us about this Reg. 16 consultation. We have no comments to make.
SNP06					Norfolk Wildlife Trust	Policy STR2: Design guidelines and codes				Y	We acknowledge and welcome reference to green roofs/walls on page 32 of the Design Codes and Guidance document.
SNP07		Julie	Cullis		Norfolk Wildlife Trust	Policy STR5: Natural assets and biodiversity		Y			As buffer zones are crucial in helping to protect sensitive landscapes and areas of high biodiversity from negative impacts of development, we welcome the addition of the following policy wording at (f): 'Buffer zones should be implemented around sensitive wildlife sites, including County Wildlife Sites, as appropriate, to protect these sites from any adverse impacts from development.' As Priority Habitats are of principle importance for the purpose of conserving biodiversity, we recommend that these are also included in the list of natural assets in the policy wording. The following Priority Habitats are present within the Neighbourhood Plan boundary: Deciduous Woodland Coastal and floodplain grazing marsh Purple moor grass & rush pastures Lowland fens, reedbeds
SNP08		Julie	Cullis		Norfolk Wildlife Trust	Policy STR6: Ecological Corridors	Y				The upcoming mandatory system of Local Nature Recovery Strategies (LNRS) will be important in mapping the most valuable areas for nature. We acknowledge and welcome the additional policy wording: 'Opportunities to create, enhance & restore habitats and strengthen ecological connectivity should work alongside priorities identified by the Norfolk Local Nature Recovery Strategy (LNRS).'
SNP09		Julie	Cullis		Norfolk Wildlife Trust	Policy STR10: Localised surface water flooding and sewage management	Y				Sustainable Urban Drainage Systems (SuDS) are extremely important in reducing flood risk, reducing pollution locally, increasing biodiversity and when used effectively can provide habitat connectivity. We therefore welcome the additional policy wording: 'All proposals must incorporate natural Sustainable Drainage Systems (SuDS) that are appropriate to the scale and nature of the development and designed to be an integral part of the green infrastructure.'
SNP10		Julie	Cullis		Norfolk Wildlife Trust	Policy STR14: Former landfill site		Y			The former landfill site includes Strumpshaw Wood County Wildlife Site/ancient woodland and an area of deciduous woodland Priority Habitat. Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. Development, including a car park, can negatively impact these sensitive habitats if sited too close. Potential impacts include noise impacts from people and traffic, dust, air pollution etc. We therefore recommend that there is an adequate distance between any car park on this site and these valuable habitats and this is reflected in the policy wording. For example, after the policy wording 'Proposals that would provide enhanced environmental and amenity value to the former landfill site (figure 53 and 54) will be supported, in particular: A sympathetically designed small car park and cycle parking for the site', we recommend the following additional wording (or similar): 'These should be sited an appropriate and adequate distance from sensitive habitats including Strumpshaw Wood, to avoid negative impacts on these habitats.'

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SNP11		Marianne	Saunders	Administrator	Broads Society	Whole Plan	Y				The Broad Society FULLY SUPPORTS the submission version of the Strumpshaw Neighbourhood Plan (Revised 2025-2045). The Society particularly welcomes Policy STR4 relating to the protection of non-designated Heritage Assets; Policy STR5 aimed at the protection of natural assets and biodiversity; Policy STR6 relating to the protection and potential creation of ecological corridors; Policy STR8 relating to the identification and protection of important local views; Policy STR9 aimed at protecting dark skies; and Policy STR12 protecting and seeking to enhance public access.
SNP12		Eleanor	Roberts	Senior Sustainable Development Officer	Water Management Alliance	Whole Plan				Y	The following is a summary, please see full response: The principal function of the IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency. In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes, the response details certain areas to be aware of, please see the full response for details.
SNP13				Planning Technical Team	Sport England	Whole Plan				Y	The following is a summary, please see full response: Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Sport England have produced design guidance notes for any new or improved sports facilities.
SNP14				Planning Policy Team	Broadland District Council	Basic Conditions Statement – Appendix 1: Statement to accompany Submission version of the Strumpshaw Neighbourhood Plan Review				Y	The following is a summary, please see full response for more detail; 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. Broadland District Council agrees with and supports Strumpshaw Parish Council's opinion that the proposed modifications are so significant that they change the nature of the adopted Neighbourhood Plan.
SNP15				Planning Policy Team	Broadland District Council	Policy STR13 (page 75)		Y			The Council responded during the Reg. 14 consultation to state that the third paragraph of STR13 was at odds with Policy CSU2 of the Council's Development Management DPD, in that STR13 takes a weaker approach to situations where proposals of change of use may be supported. The Council's Reg. 14 comment is copied below - 'Re. the third paragraph, Broadland District Council's 'Policy CSU2 – Loss of community facilities or local services' (within the Development Management DPD) states that proposals involving a change of use of a community facility will be considered where it has been demonstrated that the use is no longer viable (which Policy STR13 duplicates) 'or plans for its replacement are included within the proposal' (which Policy STR13 does not allude to). Policy STR13 it includes an alternative condition that 'an improved or equivalent facility can be located in an equally or more accessible position in the parish'. This is arguably a weaker statement, as there is no implication that such an equivalent facility should be provided. Is this the intention?' In the submission version of the policy, the words 'In line with Broadland District Council's Loss of Community Facilities or Local Services policy CSU2 and the Local Plan for the Broads policy DM44...' have been added to the start of the policy, but this doesn't fully address our concerns regarding the wording of paragraph three of the policy.
SNP16				Planning Policy Team	Broadland District Council	'Objectives', paragraph 4.4 (page 21)		Y			Item number 3, within 'Environmental objectives' (see table) states 'resist any development which is parts of the parish that are outside the settlement limit'. This is considered too generic and presumes that development might be harmful and should be resisted. However, would there be resistance to a proposal for a nature Hide in the Broads area, for example? The Council would suggest replacing 'Resist' with 'A presumption against...' and perhaps including a specific refence to housing development.
SNP17				Planning Policy Team	Broadland District Council	'Design', paragraph 5.18 (page 35)		Y			Although the intention is understood, the last sentence is worded slightly awkwardly – 'Being able to influence the design of a development through the Design Code and Guidance document will enable the community to appreciate that it has a voice.' We would suggest an alternative phrase, such as '... will demonstrate that the community's priorities are being taken on board' or similar.
SNP18				Planning Policy Team	Broadland District Council	'Non-designated Heritage Assets', paragraph 5.36 (page 41)		Y			Some NDHAs have archaeological significance as records of past human activity. In the table, the Drainage Mill, Steam Engine House, and Pill box should all have 'Yes' entered for archaeological interest, as they constitute upstanding archaeological evidence of past uses. See: Statements of Heritage Significance: Analysing Significance in Heritage Assets.
SNP19				Planning Policy Team	Broadland District Council	'Policy STR5 Natural Assets and Biodiversity' (page 55)		Y			Under 'Enhancing biodiversity', it is not clear what is meant 'Appropriate development proposals'. Does this relate to all development impacted by statutory BNG requirements, or all development? If it's the latter, the Neighbourhood Plan cannot require all development to deliver a minimum 10% BNG (please see para Paragraph: 020 Reference ID: 74-020-20240214 of the PPG on BNG. The requirement to demonstrate 10% BNG is subject to the general planning condition. There is no statutory requirement for the developer to identify how they will achieve BNG when determining the host application.

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SNP20		Natalie	Beal		Broads Authority	Basic Conditions Statement – Appendix 1: Statement to accompany Submission version of the Strumpshaw Neighbourhood Plan Review				Y	<p>We are aware that this is a review of an already made Neighbourhood Plan. We note that a referendum may not be needed for a reviewed Neighbourhood Plan.</p> <p>We consider the Plan will need a referendum. The Plan has changed quite a lot since the original, made Plan. For example, most policies have been changed. And there is a Design Guide, which there was not included before. Furthermore, a lot of time has passed since the last Plan was made (around 13 years) and there may be more people or different people in the Parish who should have their say. Indeed, given the time since the last Plan was made, perhaps the Parishioners have forgotten about the Neighbourhood Plan.</p> <p>We recommend a referendum is required.</p>
SNP21		Natalie	Beal		Broads Authority	Whole Plan				Y	<p>The following is a list of comments and typo/grammatical errors throughout the Plan;</p> <ul style="list-style-type: none"> •Images need alt text •2.7 and 1.8 – I have not seen people named in a NP document before and not sure it is needed. •Para 2.3, 2.7 – the Broads is not a National Park. The area is the Broads Authority Executive Area. When you describe the Broads, it has a status equivalent to a National Park and is a member of the National Park family. •2.9 – there is a random reference to ‘and Broads Authority’ which does not seem to fit. •2.9 – you need to mention the Broads Landscape Character Assessment. •2.19 – the Norfolk Minerals and Waste Local Plan was adopted in 2025. •Social objective 2 refers to streetlights twice: 2. Resist the introduction of streetlights (including streetlighting) in order to maintain dark skies. •Para 5.32 states that there are 12 LBs in the parish but earlier in the document (para 2.13) the document states that there are 8. As they are listed in the later paragraph I assume this is the correct figure so para 2.13 needs to be amended. •5.5 – does this information need to be made up to date as we are in August 2025 now? •Footnote 9 – says ‘infill’ – think that should be ‘infill’. •Para 5.28 is not written well. ‘The NPPF, recognises that new employment or economic development should be sensitive to its surroundings and does not have an unacceptable impact on the character of the area, the amenity of local residents and valued environmental assets. This is particularly important to Strumpshaw. There is concern that any new business development should not have an adverse impact on the quiet, natural and built environment of Strumpshaw’. •Throughout – whilst reference to the current Neighbourhood Plan and also explanation of changes is useful for this consultation document, considering this new Plan will replace the 2014 Plan, in the final version of the new Plan, references to the 2014 plan could mostly be deleted. This would make the new Plan a bit more succinct. •Page 42 – list of NDHAs – Buckenham Railway Station has group value with other stations on the line; Buckenham Ferry Drainage Mill has group value with other drainage mills in the Broads •5.36 – I am not sure what the last part of this para means. It says ‘This list is therefore not exhaustive’. But that is the list of assets that are identified in the Plan. Are you saying that more could be added in the future or more assets could be discovered through development proposals. The last para may need a bit more explanation. •6.5 – think in first sentence you mean ‘Broads Landscape Character Assessment’. •7.1 and 7.2 – are there peak hour, weekday services serving these bus stops? •8.10, 8.11 and the policy itself – STR13 is highlighted in yellow. •STR14 – typo – ‘Appropriate proposals to increased biodiversity value of the site’. •10.5 – this is not quite correct. The NPPF at para 34 says Local Plans should be reviewed every 5 years and then updated as necessary.
SNP22		Natalie	Beal		Broads Authority	Settlement Boundary			Y		<p>Objection – lack of clarity about whether this Neighbourhood Plan is amending the settlement boundary or not. We have raised this issue before. Figure 21 says in the key ‘revised settlement boundary’ and then in the title of the figure ‘Note, the settlement boundary has been extended to incorporate the Mill Meadow development and Strumpshaw Community Hall site on Mill Road, Strumpshaw’ – so has this Neighbourhood Plan amended the settlement boundary that was in the adopted GNLP? If it has, then where is this set out in policy? If it has now, then why is this phrasing used?</p>
SNP23		Natalie	Beal		Broads Authority	Policy STR1				Y	<p>what is the definition of ‘easy walking distance’? Isn’t it the case that dwellings need to be in the development boundary? If so, depending on the definition of ‘easy walking distance’, what if a dwelling is in the settlement boundary but not within ‘easy walking distance’? If the policy and Local Plan policies direct dwellings to settlement boundaries, is the criterion relating to ‘easy walking distance’ needed?</p>
SNP24		Natalie	Beal		Broads Authority	Policy STR3				Y	<p>STR3 does not say anything about location criteria. Should the new businesses be in the settlement boundary of Strumpshaw for example? Or does the Plan defer to the Local Plans for location criteria?</p>
SNP25		Natalie	Beal		Broads Authority	Policy STR5				Y	<p>Supporting text to STR5 needs to mention our policy and guide on biodiversity enhancement.</p> <p>STR5, last criterion, f. This does not seem to be a form of biodiversity enhancement. It is different. I wonder if it needs to not be listed as it is but perhaps moved to above ‘enhancing biodiversity’. Also, there is nothing really in the supporting text about a buffer. What kind of width should this buffer be? What sites does it relate to?</p>
SNP26		Natalie	Beal		Broads Authority	Policy STR6				Y	<p>I am not sure what an applicant is meant to do to meet the requirements of this policy. I am not sure what a Development Management Officer, determining an application, is meant to do to help implement this policy. What are the actions that are needed to be taken?</p>
SNP27		Natalie	Beal		Broads Authority	Figure 40				Y	<p>Figure 40 – I think the large yellow area in the middle of the map indicated the views from A1, 2, 3, 4, 5. Should this not be displayed as triangles like the other views?</p>
SNP28		Natalie	Beal		Broads Authority	Policy STR10				Y	<p>STR10 identifies areas that have surface water flooding at the moment. These come from suggestions from the public – has evidence been provided for these issues? Also, in the policy, there is no instruction related to the list of areas with surface water issues. What is an applicant or Development Management Officer to do if a scheme is near to or at one of these sites? Or should the list actually be a community action – in that the Parish Council will lobby or liaise with the landowner, or relevant authority to get the area of surface water improved? For example, if on a highway, it can be reported to Norfolk County Council via the online forms.</p> <p>The supporting text to STR10 does not talk about water recycling centre issues or SuDS.</p>
SNP29		Natalie	Beal		Broads Authority	Policy STR11				Y	<p>what are the risks that need to be reduced? Are there specific issues which development could address? Can development be expected to sort out current issue, or is it more that schemes are encouraged to address the specific issues in the Parish</p>

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SNP30		Natalie	Beal		Broads Authority	Policy STR12			Y		The Neighbourhood Plan Group, Broadland Council and Broads Authority had conversations prior to this consultation stage on some issues that a Member of the Broads Authority raised regarding the HRA and SEA screening. As a result of those conversations, it was agreed to amend STR12 so that it includes a requirement that any new access to open countryside avoids environmentally sensitive N2K sites. This amendment has not been made. The policy needs to be amended in line with this comment.
SNP31		Natalie	Beal		Broads Authority	Policy STR13			Y		Part three that refers to proposals for change of use. The criteria there are different to Local Plan for the Broads policy DM44. DM44 says 'Applications for the change of use or redevelopment of an existing community, visitor or recreational facility or service that meets a local need or contributes to the network of facilities through the Broads will only be permitted where: a) It can be proven that there is no community need for the service/facility; or b) It can be demonstrated through a viability assessment that the current use is economically unviable'. The Inspector changed the draft policy, which included a criterion along the lines of providing another facility elsewhere. See para 97 of Broads-Authority-Local-Plan-Report-April-2019.pdf. We made this point at the last consultation stage. Objection STR13 – final part of policy 'proposals for the following...'. Suggest 'subject to other policies in the Development Plan' is added. This is because the design and location of such community infrastructure are important considerations and as worded, it is a sweeping statement implying that anything goes. We made this point at the last consultation stage.
SNP32		Natalie	Beal		Broads Authority	Design Guide				Y	Page 31, reference to 110/p/d – not just the Local Plan for the Broads, but also the Greater Norwich Local Plan. As the Character Area Appraisal for Area 10 is combined with that for Area 1 at the beginning of this section, should there be a note between the Assessment of Area 9 and Area 11 that Area 10 is on page 39?
SNP33		Steve	Hickling	Historic Environment	Norfolk County Council			Y			The Historic Environment team reference that advice issued for the previous consultation (email of 25th February, 2025, ref: CNF51038_3), noting that no records have yet been included of below ground archaeological sites, for example the numerous cropmarks in the surrounding fields, including, for example, the probable settlement site to the southwest of the village. This is a minor issue, but inclusion would display consideration about the issue of below-ground remains within the parish. Historic England's published guidance on the preparation of Neighbourhood Plans should be consulted (see full response for more detail)
SNP34				Lead Local Flood Authority	Norfolk County Council	Whole Plan				Y	The following is a summary; The LLFA welcomes references retained in the documents and proposed policies to flooding from sources such as surface water and rivers (fluvial from River Yare and its tributaries), as well as the need for new developments to be sustainable, protect the environment and consider the implications of climate change. The LLFA welcomes references to adhering to relevant agency guidance and existing local and strategic planning policies. According to LLFA datasets (extending from 2011 to present day), we have 11 no. records of internal flooding and 9 no. records of external/anecdotal flooding in the Parish of Strumpshaw. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA. The LLFA notes that the Regulation 16 document proposes 6 no. new Local Green Spaces identified within Policy STR7: Local Green Spaces and Figure 38 (a reduction in the 11 no. proposed as Regulation 14 stage). It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment on LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.
SNP35		Stuart	Blake	Transport	Norfolk County Council	STR7			Y		The Highway Authority still has some concerns with the proposed greenspace allocations. A number of greenspace allocation that we objected to during Reg. 14 have been removed, but two remain. Therefore, the Highway Authority maintains its objection to the below proposed greenspace allocations. 4. Footpath to Stone Pit and former land fill site: Objection - Footway is a Public Right of Way (FP17). Green Space allocation could impact highway rights. 6. Railway Wood: Objection – Public Right of Way (FP5) crosses proposed Green Space allocation which could impact highway rights over land.
SNP36		Joe	Wyatt	Minerals and Waste	Norfolk County Council	Paragraph 2.19				Y	Paragraph 2.19 requires updating as follows, because the Norfolk Minerals and Waste Local Plan was adopted in May 2025: "The Norfolk Minerals and Waste Local Plan (NM&WLP) was adopted in May 2025, it identifies the minerals and waste development needs, contains minerals and waste planning policies and safeguarded minerals and waste sites in Norfolk. This, together with the Local Plans produced by Norfolk's Local Planning Authorities and Neighbourhood Plans, form the Development Plan for Norfolk.
SNP37		Sally	Wintle		Natural England	Whole Plan				Y	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. Please see the full response for more detail.