

Trowse Neighbourhood Plan 2019-2038



Consultation Statement

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Introduction

Overview of the Trowse Neighbourhood Plan

1. Trowse Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It establishes a vision and objectives for the future of the parish and sets out how this will be realised through non-strategic planning policies.

About this Consultation Statement

3. This consultation statement has been prepared by Collective Community Planning on behalf of Trowse Parish Council to fulfil the legal obligation of the Neighbourhood planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
 - a) Details of the persons and bodies who were consulted about the proposed neighbourhood plan;
 - b) Explains how they were consulted;
 - c) Summarises the main issues and concerns raised by the persons consulted; and
 - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
 - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood plan area:
 - i. Details of the proposals for a neighbourhood plan;
 - ii. Details of where and when the proposals for a neighbourhood plan may be inspected;
 - iii. Details of how to make representations; and
 - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
 - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood plan; and
 - c) Send a copy of the proposals for a neighbourhood plan to the local planning authority.
5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood plan, and ensure that the wider community:
 - Is kept fully informed of what is being proposed;

- Is able to make their views known throughout the process;
 - Has opportunities to be actively involved in shaping the emerging Neighbourhood plan; and
 - Is made aware of how their views have informed the draft Neighbourhood plan.
6. This statement provides an overview and description of the consultation that was undertaken by the neighbourhood plan steering group on behalf of Trowse Parish Council, in particular the Regulation 14 Consultation on the pre-submission draft. The steering group have endeavoured to ensure that the neighbourhood plan reflects the views and wishes of the local community and the key stakeholders.

Summary of Consultation and Engagement Activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Trowse Neighbourhood Plan that was consulted upon as part of the Regulation 14 Consultation.
8. A significant amount of work went locally into engaging with the community early in development of the plan, so that it could be informed by the views of local people. Consultation events took place at key points in the development process. A range of events and methods were used.
9. An important point to note is that the plan was being developed during the Covid-19 Pandemic and therefore restrictions applied that impacted on the activities that could be undertaken. During this time the Parish Council and steering group needed to abide with national and local restrictions, adjusting the way that communication took place with the community accordingly. For example, consultation events could not be undertaken in the same way they traditionally would have been, and online became a key method of engagement, especially during 2020 and 2021.

Early Engagement in Developing the Plan

Date	Activity	Summary
November 2019	Area designation	Area designation approved by South Norfolk Council and the Broads Authority
January 2020	Initial Steering group meeting	Membership of the group changed throughout the plan's development, initially comprising 11 people, a mix of parish councillors and residents.
January 2020	Neighbourhood Plan page established on the Trowse Parish Council website	Regularly updated throughout the process with current documents.
October to mid-December 2020	Initial consultation and engagement with the community on issues and options for the plan	The consultation involved raising awareness of the neighbourhood plan's development, and a survey with 26 questions. Overall, there were 146 responses to the survey, around 17% of the village's population. As

Date	Activity	Summary
		part of the consultation a leaflet was delivered to all households, there was content on the website, posters and social media.
February 2021	Engagement with Norfolk Biodiversity Information Service	Mapping data of trees, hedgerow, field margins and waterbodies provided by NBIS to support development of green corridors in the parish.
September 2021 – May 2022	Design Codes Developed	AECOM commissioned to develop design codes for the parish, included engagement with members of the steering group during visit to the parish
March 2022	Owners of Local Green Spaces informed that their land was being considered for designation within the plan	Formal letters sent from the Parish Council to all owners of Local Green Spaces
March 2022	Informal comments from South Norfolk Council and the Broads Authority	Provision of informal comments from the local authorities on the draft plan, prior to Regulation 14 consultation.
April-May 2022	Consultation with the Statutory Environmental Bodies on the SEA/HRA Screening Assessment	Statutory consultation, facilitated by South Norfolk Council, which determined a SEA/HRA appropriate assessment would not be required.
June 2022	Regular Parish Council newsletter established	Regular updates on the Neighbourhood Plan provided within this.

Early Engagement – Summary of the main issues raised

10. An initial consultation exercise ran for 7 weeks from 23 October to 13 December 2020. This included a survey with 26 questions. There were 146 responses which is 17% of the village's population.

11. The main issues and concerns raised included:

- Residents are keen on supporting wildlife within the village, with gardens seen as an essential part of the green network within the parish.
- Trowse is considered to be a special place by those people who live there and many residents described local green spaces, views and heritage assets that are important to them.
- There is support for retaining separation between the village and Norwich.
- People are concerned about the impact of development on the former May Gurney site and whether this will affect the character of the village.
- In terms of housing growth, 2 or 3-bed family homes and starter homes are considered to be most in need within the community.

- Parking is a significant issue within the village. Although there is some differing of opinion on how this should be managed going forward, almost all respondents felt that new development should provide adequate off-street parking for residents and visitors.
- There is strong support for improving sustainable travel options, including footpaths, cycle routes and the bus service. There is support for a new bus stop outside the White Horse Lane development. Barriers currently exist with respect to cycling into the city centre, with the route currently disjointed and considered to be unsafe from the County Hall roundabout up Bracondale.
- There is a good level of support for a new community centre, though some people questioned whether better use could be made of existing community facilities instead. Responses indicate that a village shop is missed by many.

Early Engagement – how this was considered in development of the pre-submission plan

12. Residents recognised that there has been a fair amount of development recently within the village, and that there will be further development on the former May Gurney site. The neighbourhood plan was seen as an opportunity to influence the design of this development and a policy around this was developed.
13. Transport issues are a significant concern for residents so a section on encouraging sustainable travel, including identification of a cycle network for Trowse, and reducing the impact of traffic through the village was included. Alongside this, members of the steering group developed a transport plan, which includes actions which will be considered further by the Parish Council.
14. Feedback in relation to design, and particularly that buildings should be sympathetic with the look and feel of the area, was fed into the work on developing Design Codes. This was led by AECOM, but members of the steering group met with AECOM to undertake an initial walk around and identify key priorities. Design also has allowed different policies to reflect the design codes in developments that may come forward including considering eco-friendly principles such as SuDS, residential parking,
15. Following feedback from residents on the importance of the local environment and preserving this, the steering group decided to develop green corridors. These and the protection of local green spaces form a central part of the plan. As well as green spaces the steering group and parish council considered how to further protect the historic environment. The plan identifies non-designated heritage assets, which were assessed in accordance with Historic England guidance.
16. Services within the village were stated to be important so a policy that identifies the most important community facilities has been developed. This includes the services identified by residents during consultation. The policy on community facilities also supports provision of a community hub within the village, which was strongly supported by residents.

Regulation 14 Consultation

Overview

17. The consultation ran for 8 weeks from 16 December 2022 to 12 February 2023.

18. The activities undertaken to bring the consultation to the attention of local people and stakeholders is set out below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Date	Activity	Summary
16 December 2022	<ul style="list-style-type: none">Emails and letters sent to stakeholders advising them of the Regulation 14 consultation and how to make representations. This included owners of Local Green Spaces.	An email or letter was sent directly to each of the stakeholders, including statutory consultees, supplied by South Norfolk Council, in addition to local stakeholders. The email/letter informed the stakeholders of the commencement of the consultation period. The email notified consultees of the NP's availability on the website, alongside supporting materials, and highlighted different methods to submit comments. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 30 September. A copy of this is provided in Appendix A.
W/b 16 December 2022	<ul style="list-style-type: none">All draft NP documents and link to the online survey were published on PC website.Hard copies of draft NP were placed in the Manor Rooms.Article publicising the consultation in the Parish Council newsletter that went to every household in the parish.	<p>Various methods were used to bring the Regulation 14 Consultation to the attention of local people. All methods stated the consultation dates, where NP documents could be accessed and how to respond.</p> <p>People were able to make representations by:</p> <ul style="list-style-type: none">Completing an online survey.Filling in a hard copy of the survey or electronic version of the survey and sending this to the parish clerk.Providing feedback via letter or electronically to the parish clerk. <p>The NP documents made available as part of this process included¹:</p> <ul style="list-style-type: none">Regulation 14 version of the Neighbourhood PlanDesign Guidance and CodesLocal Green Space Assessment

¹ <https://trowseparishcouncil.norfolkparishes.gov.uk/neighbourhood-plan/>

Date	Activity	Summary
		<ul style="list-style-type: none"> Non-Designated Heritage Assessment Views Assessment Evidence Base SEA / HRA Screening Assessment
Saturday 14 January 2023	<ul style="list-style-type: none"> Consultation Event 	Consultation event held at the Manor Rooms where residents could review the draft plan and speak to people on the steering group about it. Hard copies of the plan and survey were available. Around 20 people attended the event.

Feedback from Regulation 14 Consultation

1. Fifteen stakeholders wrote to the steering group with their comments on the draft plan, either in letter or email form. In addition, 23 residents responded to the online survey.
2. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.

Responses from Statutory Stakeholders

Anglian Water

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 2: Support policy	Noted
Design Checklist: Would recommend including water efficiency measures.	Not possible to amend this document at this stage
Design Guidance and Codes: Suggest amendment of a minor typo in the document	Not possible to achieve this as the document has already been signed off by Locality.
Policy 3: Support requirement for green infrastructure. Further consideration could be given to referencing design code DC1.4 Blue-Green infrastructure and wildlife.	Section on green infrastructure included within the policy.
Policy 4: Support policy	Noted
Policy 5: Policy considered adequate to enable AW to access infrastructure where required, eg for maintenance	Noted
Policy 8: Include para 88 within the policy text. Recommend including a clause with regard to major development requesting a surface water connection. Include reference to Design Code DC.6 within the policy text.	<p>Don't agree that para 88 is needed in the policy text as this is already required by the LLFA.</p> <p>Reference to DC.6 is made in the policy.</p>
Policy 13: Supportive	Noted

Stakeholder comments to the Regulation 14 consultation	NDP Response
General Comments Please can you check the accessibility of documents? The images need to have alt text for example. I suggest numbering each part of a policy so it is easy for reference.	Updated
Comments on the plan	
Para 10 – there is a specific policy for Whitlingham Country Park in the Local Plan for the Broads which could be referenced.	Added reference
Para 21 says ‘The proportion of three-bedrooms homes in Trowse will, reduce as a result of the Norfolk Homes development, to just below one-third.’ – I don’t think the two commas are needed.	Amended
Para 27 – please say that the Broads Authority are producing their design guide and recently consulted on it (end of 2022).	Added
Figure 4 could do with being a bit bigger so the key can be read easier.	Reviewed for all maps in the NP
Policy 2 – Please see comments on the design guide – we feel that as written, the design guide does not adequately reflect the Broads, but if our comments are taken on board, that issue will be addressed. In some other areas where the design guide does not address the Broads well, it does not apply to the Broads. Policy 2 – Para 3 – I am a bit confused as to why you have brought out four areas of the design code. The code has guidance for the entire parish, so why only talk about 4 areas?	Amended the plan to state that the design guide does not apply to the BA area. These are the four character areas identified in the Design Code report
Para 39 last sentence just ends and seems to not be finished.	Updated
Para 4- ‘known as May Gurney site’?	Updated
Figure 9- could do with being bigger as it is hard to read the key and other writing.	As above, reviewed for all maps
Para bottom of page 20 –para number missing,	Updated
Para 44 – and the May Gurney site is immediately adjacent to the BA Executive Area.	Updated
Para 52 – Would suggest: ‘This is particularly important for parts of the site adjacent the river as there are key views across the river from Trowse and it is immediately adjacent to the Broads Authority Executive Area.’	Updated
Para 53 – the second sentence – is quite long and I am not sure it reads well – for example the wording about County Hall does not link to the rest of the para it seems.	Reworded
Policy 3 – ‘May Gurney site’?	Amended policy title
Policy 3 is written like a vision by saying things like ‘The development will have high quality design...’ but there is no instruction here. You might want to say ‘will need to’ or ‘must’ or ‘will be required to’.	Reviewed the policy with this in mind.

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 3 and supporting text – you may want to refer to the setting of the Broads as that is protected through the NPPF.	Added reference to this in the supporting text.
Policy 3 – when you talk about trees, you might want to say ‘the right tree in the right place’.	Updated
Policy 3, first para under transport links title – says ‘Where adjacent spaces or buildings, the visual impact of this should be mitigated through planting.’ – does this refer to cycle parking still? It is not clear.	Removed this from the policy.
Policy 3 under transport links, second para says ‘this is a condition of planning permission’ – do you mean this must be a condition or already is – as written, it is not clear.	Removed this from the policy, it is a condition of the existing permission.
Policy 3 – general check of the use of should and the use of the word encouraged as well as the use of will as mentioned above.	Replaced ‘encouraged’ with supported throughout policies.
Policy 3 - should perhaps contain some reference to the site being immediately adjacent to the BA Executive Area and the protected setting of this.	Inserted where appropriate
Para 62 – BNG is set for November 2023.	Updated, with this and the announcement re small sites
Para 63 – suggest you refer to our Biodiversity Enhancements Guide	Added reference
Policy 4 – suggest you need to set a threshold to which the BNG requirement will apply – all new and replacement buildings perhaps? It could apply to a sign or replacement windows as written.	Updated policy to reflect new/replacement buildings
Policy 4 – I can guess that you want applicants and DM officers to use the NE metrics (3.1 and small sites), but you do not say this in the text. You say it in the policy, but only in relation to 10 to 25% BNG.	Added this into the supporting text.
Policy 4, f – something we are looking into is, given the changing climate such as the hot summers, is it best to have native species? That being said, non-native species may suffer in the cold. No answers yet, but it is an issue we are thinking about.	Amended this requirement, which has been picked up in other recent examinations also
Policy 5 – is the sentence starting with ‘new buildings are inappropriate’ meant to be the first bullet point? It is not at the moment.	Added in extra line to separate this sentence
Section 6.3 – if you are talking about landscape, you might want to mention the Broads here.	Added reference to the Broads
Policy 14 – should it seek the re-use and retention of the non-designated heritage assets?	Added this into the policy
Comments on the evidence base	

Stakeholder comments to the Regulation 14 consultation	NDP Response
The date on the front is February 2020. I would suggest that the evidence needs checking and updating where possible and the date on the front updated.	Reviewed and update accordingly
Section 1 does not really explain about the Broads and that part of the area. Would suggest this needs improving.	Added reference to the Broads. Make more of this, critical part of the landscape character. Drawing a picture of the Broads was seen important at the meeting.
Section 3 – I can't see the source for much of the information in here.	This section is the vision and objectives, so not sure it needs a source.
Figure 8 could be updated.	Reviewed and updated
Page 11 – is the school open?	Yes, the school on site TROW1 opened in November 2020 and further information added.
Page 12 – you could update the completions data. Think that is 3 years old now.	Requested data from South Norfolk Council 27/04/23 and updated accordingly with information supplied by the officers and from updates provided in the GNLP examination papers.
Does section 5 need updating?	Reviewed and updated accordingly from information provided by SNC.
Figure 11 – what is the source and year (and does it need updating)?	Added source and date and updated as of April 2023.
Figure 21 – is the red line the conservation area – don't think it is on the key	The red line is the conservation area. However, we cannot

Stakeholder comments to the Regulation 14 consultation	NDP Response
	amend the map because it was made by the South Norfolk Council. Will add reference to the red line in the supporting text.
Comments on Views Assessment	
Does it matter that the last view discussed does not have a photo?	Photo now included
Comments on Design Codes	
Whilst the Guide has considered the context of the Broads, the omission of reference to the status of the Broads, policyWHI1 and the emerging design guide are worrying and need to be addressed in order for the Design Guide to apply to the Broads.	It is not possible to amend the Design Codes document again so we will ensure that the NDP refers to it not being applicable to the Broads area
<p>1.3 – this section needs to mention the Broads and its status as an equivalent to a National Park.</p> <p>Map on page 7 needs to show the Broads Authority Executive Area</p> <p>2.5 – needs to mention the policy WHI1: Whitlingham Country Park</p> <p>2.5 needs to mention our planning guides: Broads planning guides (broads-authority.gov.uk)</p> <p>2.5 needs to mention our emerging Design Guide that was out for consultation in October and November 2022: Consultations (broads-authority.gov.uk)</p> <p>2.5 needs to refer to our review of the Local Plan: Consultations (broads-authority.gov.uk)</p> <p>3.1 – also the area is a registered park and garden</p> <p>3.1 – 2 – do the parked cars slow vehicle speeds?</p> <p>3.1 – 5 – this is too simplistic. The Parish has areas of surface water flooding as well. And the main approach to flood risk is to not develop in flood zones in line with the NPPF. This section needs addressing as it is misleading and not in line with national policy.</p> <p>Figure 05 – needs to show the area of the registered park and garden</p> <p>Figure 05 – a good map, but would benefit from having its own page.</p> <p>Fig 05 should also show the BA boundary.</p> <p>3.1 – no mention of the Broads and its status in this section.</p> <p>3.2 – part of the TNCA is in the Broads and that needs to be mentioned.</p> <p>Page 18 – bullet above ‘green corridor’ – for consistency, does this need to start with ‘opportunity’?</p>	<p>This is the Design Guide, an independently developed/written document produced by AECOM.</p> <p>Unfortunately, at this stage it is not possible to amend the Design Codes document again so we will ensure that the NDP refers to it not being applicable to the Broads area.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>Page 18 under 4 – says ‘a network existing the hedgerows and trees’ – does not make sense as written.</p> <p>Figure 07 – needs to show the area of the registered park and garden</p> <p>Figure 07 – a good map and on its own page, but could be bigger and utilise the blank space on the page.</p> <p>Figure 07 – the numbers do not appear on the key – what do they depict?</p> <p>Page 20 – the dates have been and gone and so suggest this section needs updating</p> <p>3.3 – this area seems to be in the setting of the Broads which is protected in the NPPF and therefore the setting of the Broads needs to be mentioned here.</p> <p>Figure 12 – needs to show the Broads for context</p> <p>Figure 12 – a good map, but would benefit from having its own page</p> <p>DC1.2 – an ideal place to refer to the fact that part of the parish is in the Broads, yet there is no reference.</p> <p>Generally, in reference to trees, should the guidance be ‘the right tree in the right place’?</p> <p>Again, in relation to trees, an issue we are talking about – given the changing climate (hotter summers in particular), should trees be native? Will they survive? That being said, will non-native trees cope with the cold? We don’t have an answer yet, but this is something we are looking into and the consultants may have some thoughts?</p> <p>DC1.3 – how about the country park? Isn’t that a landmark? Does that relate to views?</p> <p>DC1.4 – an ideal place to refer to the fact that part of the parish is in the Broads, yet there is no reference.</p> <p>DC1.4 ‘New development should avoid threatening existing ecological assets e.g. Whitlingham Park’ etc’ add the Broads National Park?</p> <p>DC2.1 – should there be mention of and reference to Manual for Streets here?</p> <p>Page 29, third bullet in first green box – there is an end bracket, but no start bracket</p> <p>Figure 18 – a good map and on its own page, but could be bigger and utilise the blank space on the page.</p> <p>Figure 19 does not look like a tertiary road – it looks more like a mews</p> <p>2.3 – also the ski slope and the campsite are reasons to visit the area. Does it need to mention the demand from Norwich City supporters when there is a home match?</p> <p>Figure 26 – why is this a bad example? Some explanation would help.</p> <p>Figure 55 is quite blurry.</p>	

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>Page 63 and Figure 70 and 71 Character Areas – there is an area shown as ‘The Broads’ character area. However the actual Broads area is larger than this. Could there be a note to clarify this so as not to lead to confusion?</p> <p>Page 65 is the first real reference to the Broads and its status.</p> <p>Page 65 section on TB-The Broads – this should explain that the TB area shown on the plans is not the actual area of the Broads, which extends almost into the village or alternatively the plans should be amended to show the Broads Executive area.</p> <p>DC5.5.2 – should the setting of the Broads be referred to here?</p> <p>Section 6 – there is no mention of the Broads anywhere in the general questions section and it seems prudent to do so given the status of the Broads.</p> <p>There seems to be nothing about light pollution in the Guide.</p>	

Norwich City Council

Stakeholder comments to the Regulation 14 consultation	NDP Response
Significant progress has been made on the East Norwich Regeneration masterplan and the GNLP, which is now at advanced stages of the public examination process. This needs to be reflected in the NDP, as at present there are conflicts and as currently drafted there are conformity issues, related to Policy 3 on the May Gurney site. Various links to the most recent published documents are provided.	Updated the supporting text to reflect the current context.
Policy 1 – it is unclear where the evidence for 50% of new homes required to be 3 bedroom properties has come from.	It is felt that this is adequately clarified in the supporting text already, but reviewed and added further explanation where possible.
Policy 3 – what is the status of this policy? Is it an allocation policy? The GNLP policy and the supplementary planning document which is being prepared to support it will cover the detail and content of the site.	This policy aims to influence design of development coming forward on the May Gurney site. Neighbourhood Plans are encouraged to include design codes for development which have been identified through engagement of local people, which this has. It is recognised that the GNLP policy has some weight, and that the SPD has been to committee, but it currently has no weight in the planning system.
The policy conflicts with the East Norwich masterplan which identifies the MG site could	The Masterplan is not a planning policy document. Also, the Masterplan identifies that the

Stakeholder comments to the Regulation 14 consultation	NDP Response
be suitable for 1-4 storeys, and landscape buffer required, which is not in the Masterplan.	MG site 'could' be suitable for 1-4 storeys. It doesn't state that this is what should be delivered, or even have any policy status.
The policy does not accord with the extant consent for the site with regard to the quantum of development	The extant consent is outline permission. The policy is not inflexible and as with other design policies, should be used in so far as it does not undermine the number of homes to be implemented on site. It does not amend the quantum of development to be delivered.
The Design Codes document makes no reference to the emerging GNLP	It is no longer possible to amend the Design Codes document which was produced by AECOM
Lack of justification for the MG development being considered a 'hamlet'	Removed reference to it being a hamlet and instead would like it to be considered an extension of the model village.
Figure 12 in the Design Codes document is too detailed and inappropriate given the emerging GNLP and Masterplan documents which have been through the committee system	The Design Code was produced by AECOM on behalf of the NP group, it is an independent consultant's viewpoint. It is not possible to amend it at this stage.
Policy 4 – the 10-25% BNG threshold goes beyond the 10% requirement in the emerging GNLP, so is out of conformity. There is a lack of evidence to support this requirement.	The policy states that proposals with BNG exceeding national/local requirements will be looked upon favourably in the planning balance, it does not require it. This is felt to be positive, and it is unclear how it is not within general conformity.
The purpose of including the national habitat enhancement zone in Figure 15 is unclear	This is part of the background evidence to developing the Green Corridors.
Views – unclear how have these been assessed for inclusion	The process for identifying views is set out in the supporting text for policy 7. The detailed assessment is in the Views Assessment Document which accompanies the NDP.
Reference should be made to the new sports and physical activities study	Added reference to this where appropriate.
Figure 20 appears to have some missing info from the key	This figure was taken from the AECOM Design Guide and has now been removed from the NP.
Para 103 should be updated with the latest published figures	Updated accordingly as per the representation
Figure 8 of the evidence base needs updating as per GNLP housing trajectory	Asked an officer working on the GNLP for links on the housing trajectory as it stands. Added in

Stakeholder comments to the Regulation 14 consultation	NDP Response
	links/footnotes and information relevant in Section 4 with regards to the latest information.
Timescales for the GNLP need updating throughout documents	Asked an officer working on the GNLP for an update. Added in necessary information/links where appropriate.

South Norfolk Council


Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General comments	<p><u>Planning Policy</u></p> <p>Overall, this is a very thorough and comprehensive draft Neighbourhood Plan, which seeks to address the issues which are clearly of most concern to the local community. The steering group should be congratulated on the work undertaken so far in the production of the proposed plan. General comments / typos that have been identified are listed below:</p> <p>Please ensure that all maps and figures through the documents have the correct source referenced.</p> <p>Accessibility – all of the documents currently have accessibility issues. These will need to be WCAG compliant in order for South Norfolk Council to accept the documents at submission stage. Please let us know if you would like to discuss this in more detail.</p> <p>Paragraph 30 – tree'd should be treed.</p> <p>Paragraph 32 – there is a typo – should be “hipped” and not “hopped” roofs.</p> <p>Throughout the NP and in supporting documents Russell Terrace appears spelt ‘Russel’. On looking at Street view the plaque on the wall spells it ‘Russell’. This needs checking and rectifying if applicable.</p> <p>Paragraph 126 – 18th century should be 19th century.</p>	<p>Noted, amendments to be made to reflect comments</p> <p>Updated views map to say Russell</p>
Policy 1	<u>Planning Policy</u>	There is room for flexibility within the policy, where

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>It is noted that for smaller infill developments this mix may work, but given the larger scale proposals for the May Gurney site, there may need to be caution of rigidly applying this.</p>	<p>evidence is provided that a lower number of three bed homes is justified or the scheme becomes unviable.</p>
Policy 2	<p><u>Planning Policy</u></p> <p>The policy does seem very prescriptive and I wonder how enforceable it is when a particular application is being considered, for example criterion g) about front and back gardens being 'well vegetated' seems to be placing a burden on new residents that wouldn't be applicable to existing housing and one which would be difficult to enforce. It is not clear what the word 'variety' in the first paragraph means; variety of styles, variety of uses? It could be the case that in some circumstances (e.g. a terrace of houses), you would be looking for uniformity?</p> <p><u>Senior Heritage & Design Officer</u></p> <p>Please see comments specific to the design code and the design elements in Policy 3.</p> <p>Paragraph 37 could make it clearer that this is front elevations and side elevations where visible or fronting onto the street (it varies depending what is proposed) to avoid unnecessary enquiries to the council such as replacing rear windows.</p>	<p>This policy is based on the Trowse Design Codes, which NPs are encouraged to develop. The policy essentially sets out that development should demonstrate high-quality design and be consistent with the Design Guidance & Codes. The policy then goes on to highlight the codes that are especially important to the area.</p> <p>Amended the plan to reflect the comment about front elevations.</p>
Section 5 & Policy 3	<p><u>Planning Policy</u></p> <p>The NP Policy doesn't seem to be grounded in the Strategic Policy in the emerging GNLP, which allocates this site for development as part of the wider 'East Norwich Strategic Regeneration Area'. There is some overlap with the GNLP Policy, whilst other aspects might be considered at odds. The NP does refer to the Masterplan on which there has been recent public engagement; in respect of this, it would probably be more relevant to note that the Stage 2 Masterplan and draft Supplementary Planning Document have been considered by</p>	<p>The intention of this policy is to influence the design of development that comes forward on the former May Gurney site in a way that ensures it relates well to</p>


Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>South Norfolk's Regulation and Planning Policy Committee (2 December 2022), rather than Norwich City Council's Cabinet.</p> <p>The NP focusses very much on the rural aspect of the site, but doesn't address the fact that this is a former employment site (now disused), with extensive hardstanding, and instead seeks the type of buildings that 'might' have existed as Trowse developed pre-19th Century, without acknowledging the changes over the intervening period (including those 19th Century buildings the policy also seeks to retain). Whilst the site is very rural on some boundaries, and the GNLP acknowledges this, there is a variety of development in close proximity, including the Trowse asphalt works and relatively high density/3-storey housing at Trowse Millgate. There is also an extant permission for the site which would be significantly at odds with Policy in the NP. Whilst there is a need to respect the local context, it is not clear what the justification is for considering the May Gurney site a separate 'hamlet', rather than a more cohesive element of the wider East Norwich Regeneration Area. As a brownfield site with associated infrastructure requirements it is not clear how the type/scale of development proposed by the NP would be viable, therefore there is a concern that the NP would not be effective in the context of the NPPF. Overall it is not clear how the principles in the Policy have been established and justified or how they relate to the wider design principles in Policy 2.</p> <p><u>Development Management</u></p> <p>Draft policy 3 is at odds with the extant outline permission on the Deal Ground/May Gurney sites. The parameters approved at outline already indicate 60-80 dwellings on May Gurney and this policy should support a level of development that is capable of meeting the densities already permitted the outline stage.</p> <p>It should also take account of emerging GNLP0360 for the wider May Gurney/Deal Ground site (as part of the East Norwich Regeneration Area) and the numbers looking to be achieved there. It is felt that the design principles that the Neighbourhood Plan seeks to establish in relation to the former May Gurney site should not be restricted to this site and should be considered as part of the wider development area.</p>	<p>Trowse and reflects the views of the community.</p> <p>The NDP has to reflect the current strategic context, not the emerging, although it is recognised that the emerging GNLP is at examination.</p> <p>The preference of residents in Trowse is that this site becomes an extension of the model village, and therefore it needs to be in keeping with the current village, and not have an industrial look.</p> <p>Removed reference to the May Gurney site becoming a hamlet, instead focus is on extension of the model village.</p> <p>The policy is not inflexible and as with other design policies, should be used in so far as it does not undermine the</p>

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	<p><u>Senior Heritage & Design Officer</u></p> <p>There is some concern with section 5 which is a new addition to the Neighbourhood Plan and the need for this to be compatible with the existing outline permission for 60-80 homes and the East Norwich Masterplan. This section does seem at odds with paragraph 29 of the NPPF which states “Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”. It is also contrary to paragraphs 124 and 125 in terms of achieving appropriate densities in a sustainable location, and footnote 18 (p.10) “Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.”</p> <p>There are some contradictory phrases in terms of aims/policy regarding the nature of the site. For example, paragraph 40 identifies the site as brownfield, but in paragraph 44 it suggests that, prior to May Gurney, the land was pasture for agricultural uses and that this should offer cues for the design of the buildings. Paragraph 47 says that there could be 40 dwellings in a rural/semi-industrial setting. On the one hand it is saying that it is brownfield and in a semi-industrial setting, but on the other hand it states that the site is on the rural edge and that design should reference agricultural character.</p> <p>The idea of suggesting a new ‘model village’ has some merit – however paragraph 51 states that “any development at the settlement edge should typically be of a lesser density and a low-profile (preferably single-storey) than the rest of the settlement area to achieve a soft and graduated transition into the rural landscape.” Although it is appreciated that the plan does not wish for Norwich, urban-style development, at the same time this is not a typical site on the rural edge, with regard to the setting with the pumping station area to the north. Considering its past commercial/industrial brownfield use, in design terms, there appears to be no justification for it to be a lower density than the rest of Trowse.</p> <p>The supporting text, particularly paragraph 52 along with the main policy, looks to be overly prescriptive in terms of the individual site and in some parts is contradictory. Whilst</p>	<p>number of homes to be implemented on site. It does not amend the quantum of development to be delivered.</p> <p>Reviewed the text and considered any inconsistencies.</p> <p>Removed text relating to uncultivated grass in the supporting text.</p> <p>Disagree that the area is not a village edge/rural setting.</p>


Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>accepting that the site will have its own character, the policy then looks to set out what this character should be, in some detail. The policy states “The style of buildings should represent the kind of buildings that might have existed as Trowse developed” and “The area in the parish outside the main village would have been farms and agricultural outhouses. Building styles should reflect this with low levels, brick materials, flint pantiles and barn/outbuilding styles. There is an opportunity to use ecobuilding techniques such as cob and straw, bamboo and recycled plastic bricks” The materials suggested are different to those mentioned in the background text in paragraph 52, so this introduces inconsistency and ambiguity.</p> <p>The intention behind paragraph 53 is unclear - “Between homes, there should be rough and uncultivated green spaces with a minimum of car parking as this area should be regarded as a car-free development with adequate cycle and public transport provided. “ This sounds like it is promoting what would be considered ‘left over spaces’, which is not good practice in urban design terms. It is also contrary to the advice on public space in the Design Code (p40), which states that “all open space should have a purpose and be of a size, location and form appropriate for intended use.” Perhaps this could be better worded in such a way as to ensure that there are not left over spaces around housing and that public space has an intended purpose with appropriate landscaping and planting schemes.</p> <p>In general terms, the policy and background text could be phrased towards preserving and respecting the natural character of the area, especially the river, rather than considering it as a village edge and rural setting. With regard to the design of the actual buildings, these need to reflect the character of the site and of the wider area, too (e.g. the existing building on The Street which is quite urban, the pumping station site to the north being quite industrial, and the design of the rest of the emerging East Norwich site). In summary, it is felt there is a lack of justification for the stylistic approaches and materials suggested by the plan, as regards this site, and it is felt that the approaches suggested are not entirely appropriate for the context.</p>	

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Section 6: Natural Environment	<p><u>Ecologist and Biodiversity Officer</u></p> <p>Paragraph 59 - BAP Habitats have been superseded by habitats and species of principal importance in England which includes 56 habitats and 943 species first identified as priority habitats and species</p> <p>https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england.</p> <p>Just a note to say the NPPF being updated as part of the Levelling up Bill.</p> <p>There is no mention of the East Norwich masterplan https://www.norwich.gov.uk/masterplan which will potentially have a substantial impact on the parish – notably from recreational impacts. The GI strategies also need to link up.</p> <p>Given that the majority of the Parish is already in a strategic GI corridor, it is not clear how the proposed adds to (or detracts from) that already identified. Also, the plan should clearly state how the GI corridor will deliver additional benefits - for example, the Policy 8 of the emerging Diss Neighbourhood plan requires <i>'Proposals for new development within or adjacent to a green corridor must deliver measurable net gains in biodiversity which exceed national or local policy requirements or deliver qualitative improvement to the corridor....'</i> . Could this be considered – the identification of a GI corridor needs to result in additional benefits rather than just those that would be expected? The BNG also only relates to habitats (woodland, ponds, grassland) rather than bat/bird boxes.</p> 	<p>Updated the plan to reflect changed terminology to species of principal importance</p> <p>Included a reference to the NPPF being updated.</p> <p>Added reference to East Norwich development and its likely impact</p> <p>Have reviewed published GI strategies and not identified the map shown or been able to see the detail of GI corridor locations.</p> <p>Added policy wording with respect to the green corridors.</p> <p>Move e to the body of text within the policy instead so it doesn't appear to just be relevant to BNG.</p> <p>Added some policy wording around lighting.</p>

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	<p>Consideration should also be given to dark corridors, and perhaps a lighting policy (there are two remaining allocated but undeveloped sites in the parish – one for a park and ride, and the East Norwich Deal Ground strategic land. This would be an opportunity to require secure lighting design strategies should you wish. Consideration could be given too:</p> <ul style="list-style-type: none"> • Maintain a network of dark corridors and bat foraging habitats (at a maximum of 0.5 lux) through our landscapes, avoiding impacts such as direct loss, fragmentation, disturbance and lighting. • Avoid the use of artificial lighting as much as possible, including lighting only where it is absolutely essential for health and safety reasons. Warm amber lighting should be used to reduce impacts on wildlife. <p>Where lighting cannot be avoided altogether then it must be designed to avoid light spill onto roosts, foraging habitat and commuting routes</p> <p>Paragraph 64 - Several of the GI corridors are privately owned. How will developers be able to target GI in these corridors?</p> <p>Paragraph 65 - numbering is mixed up- para 65 refers to Fig 12 but its labelled Fig. 11.</p> <p>Paragraph 66 - It states that further work to determine the exact extent and location of corridors will be undertaken between the community and local landowners, but it is not clear what the outcome of this will be, where and when this be published/how will this be enforced. The Local Nature Recovery strategy is being prepared which will feed into the National Nature Recovery Strategy. These should be considered as and when they are available.</p>	<p>Link to Local Nature Recover strategy added</p>
Policy 4	<p><u>Planning Policy</u></p> <p>In criterion f) it is not clear how development would utilise native British 'fauna' and in the concluding paragraph it is not clear how 'of greater value' will be defined (how do you establish if the replacement tree is greater value and how should the tree should be valued?)</p> <p><u>Ecologist and Biodiversity Officer</u></p>	<p>Criteria f has been amended to reflect the BA's point about climate change. And see point below, species should</p>

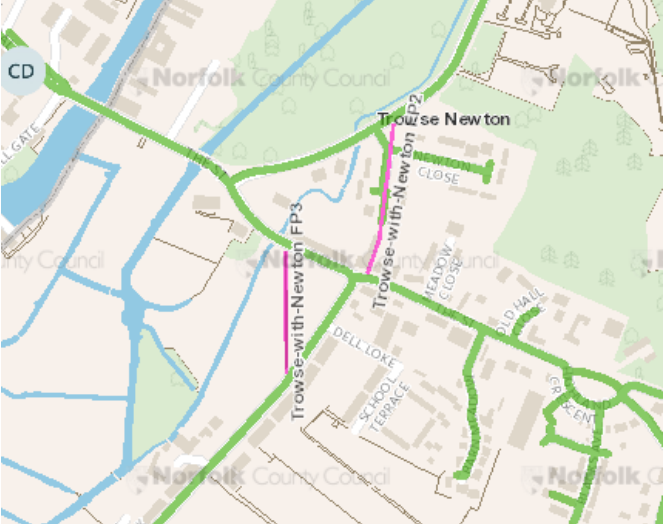
Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Part a) There is no need to include 'where possible' as the second part of the sentence adds the caveat of unless it can be demonstrated as not being feasible.</p> <p>Part b) & c) please see comments under 'evidence base' below.</p> <p>Part e) please see comments under 'evidence base' below, but also don't forget blur infrastructure – may I encourage you to require all SuDS to be designed for the benefit of wildlife https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf - this is very often overlooked. There may also be opportunities for new pond creation – water is essential for our wildlife.</p> <p>This toolkit from UK centre for ecology and hydrology may be of interest https://www.ceh.ac.uk/press/new-%E2%80%98toolkit%E2%80%99-housing-providers-support-wildlife-and-boost-residents%E2%80%99-wellbeing#:~:text=The%20toolkit%2C%20which%20was%20developed,maintenance%20that%20would%20be%20possible</p> <p>f) Several non-native species are valuable pollinators, so the species used should reflect the character of the area. Inserting the phrase 'and/or of known value to wildlife' could enhance this point.</p> <p>Fig 12 (showing the location of wildlife designations in the parish (quoted as Fig 13 in para 65) should perhaps also show wildlife sites outside the Parish (to show that they have been considered) as the concept behind GI corridors is to create more 'joined up' approach to habitat creation – strengthening the network</p> <p>65. Green Corridors in Figure 12 have been identified according to the following principles:</p> <ul style="list-style-type: none"> • The location of sites which are designated for their wildlife importance, including Whitlingham Country Park, Trowse Woods and Trowse Meadow (Figure 13); • Between these designated sites, to enable high quality core habitats to be connected by corridors of habitat; • In other locations where habitats such as woodland and hedges can be connected and augmented (see Figure 14); • Areas identified as National Habitat Enhancement Zone 2, where opportunities to support habitat creation and enhance ecological corridors should be explored (see Figure 15); and • There is a link with the strategic green infrastructure corridors identified in the emerging GNLP.  <p>Figure 11: Indicative Green Corridors</p> <p>The policy states that development delivering 10% to 25% BNG would be looked upon favourably. If a proposal looks to deliver</p>	<p>reflect the character of the area.</p> <p>Greater value would be determined through an ecology assessment or Defra's metric.</p> <p>Delete 'where possible'</p> <p>Added wildlife sites outside the parish to the appropriate map.</p> <p>Expanded the policy text relating to 10-25% BNG as recommended.</p> <p>Updated policy to reflect AIA requirement</p> <p>We have used the mapping data available to us for the location of woodland, hedgerow and waterbodies. This was provided by the Norfolk Biodiversity information Service. Specific reference to this</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>more than the minimum 10% then, in order to ensure this is delivered, we would suggest the text could be expanded as follows (or similar); 'Applications will need to demonstrate BNG as part of the planning application process using accepted national metrics and, where appropriate, BNG may be secured by condition.'</p> <p>An Arboricultural Impact Assessment should be submitted where trees/hedges are affected onsite, prepared in accordance with the BS 5837 and, where appropriate, the Hedgerow Regulations 1997. (This is in the planning application form L2630Form004_england_en.pdf (planningportal.co.uk)). This should be acknowledged and reflected within the policy.</p> <p>Where BNG is delivered offsite, the Local Nature Recovery Strategy should be used to target delivery. See https://www.local.gov.uk/sites/default/files/documents/Presentation%20for%20PAS%20deepdive%20session%20on%20offsite%20BNG_March%202022_PDF.pdf. These sites will also need to be managed for at least 30 years and secured through a conservation covenant or planning obligation. Where hedges are removed they should be replaced with either a mixed native species or with species of known value to biodiversity.</p> <p>Further, positive wildlife interventions that the Neighbourhood Plan group may wish to identify if/when refining this policy, for developers to consider as a means of delivering BNG, could be the consideration of compliance with the <i>BS 42021:2022 Integral nest boxes - selection and installation for new developments - specification</i>. E.g. equivalent of one bird box per dwelling .The Biodiversity Toolkit for housing providers https://www.researchgate.net/publication/352478809 Biodiversity Toolkit for Housing Providers and Designing for Biodiversity should be used to help guide enhancements</p> <p><u>Green Infrastructure Officer</u></p> <p>It is good to see that some of the previous comments on GI have been incorporated, but not all. It is recommended that all tree belts and woodland as GI corridors are highlighted regardless of ownership and accessibility as this does not seem to have been done (Fig 11). Also, there is no mention of blue</p>	<p>has now been made in the text.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	infrastructure and how this can be incorporated into the plan regarding the importance of these assets and access to them.	
Figure 11	<p><u>Ecologist and Biodiversity Officer</u></p> <p>This figure doesn't show the new developments off White Horse Lane which are nearly completed/completed (TROW 1 of the Joint Core strategy). If updated OS base map is available then this should be updated.</p> <p><u>Green Infrastructure Officer</u></p> <p>This figure could be more detailed and actually map the green corridors which would then give a better understanding of how these areas link up, or show where gaps are and the potential for future work/projects to reconnect areas.</p>	<p>Updated OS background.</p> <p>The green corridors are indicative at this time and the work do what the GI Officer is suggesting has not yet been undertaken.</p>
Fig 12.	<p><u>Ecologist and Biodiversity Officer</u></p> <p>It would be useful to include the CWS outside of parish boundary to show wider connectivity</p>	Added to the map
Figure 13	<p><u>Ecologist and Biodiversity Officer</u></p> <p>Not all of the 'deciduous woodland habitat' habitat of principle importance has been mapped:</p> 	<p>Checked the mapping file for BAP, is there an update?</p> <p>Updated the map with the latest data from Defra (March 23)</p>
Policy 5	<p><u>Planning Policy</u></p> <p>It would be beneficial to have larger scale maps showing the individual sites in more detail to allow readers to clearly see defined boundaries. Planning officers will require larger scale maps in order to be able to apply this policy in a clear and unambiguous manner. We would suggest including a series of</p>	Included larger scale maps

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	larger scale maps showing the boundaries of each proposed LGS as an appendix to the plan.	
Page 30 Community Action 1	<p><u>Ecologist and Biodiversity Officer</u></p> <p>Activities to encourage wildlife can include creating hedgehog highways and putting up swift boxes (Trowse seems to be a blank spot for swifts in the Norwich area - <u>Swift Mapper</u>). Reptiles are present in the area so hibernacula and log piles (refugia), and new ponds /bog gardens would be of great benefit to many species.</p> <p>Is there an opportunity within the NP to undertake a biodiversity audit of the parish – this will allow you to have a baseline against which to measure gains. And perhaps a local GI assessment? (see https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework)</p>	Added biodiversity audit to the CA.
Policy 7	<p><u>Planning Policy</u></p> <p>The more distant views within View 7 are likely to be affected by the redevelopment of the May Gurney site, as allocated through the GNLP. It would be useful for the supporting text to acknowledge this.</p>	Included within supporting text
Policy 8	<p><u>Ecologist and Biodiversity Officer</u></p> <p>In connection with Policy 4, the Neighbourhood Plan group may wish to consider suggesting, if/when refining this policy (as a means of delivering BNG), that SuDS be designed for the benefit of wildlife, unless adequate justification is provided as to why they cannot be. This document - https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf may be of assistance. There might also be the potential to use amphibian friendly drainage https://www.arguk.org/get-involved/projects-surveys/saving-amphibians-in-drains and wildlife friendly kerbs.</p>	Recommend including as suggested
Policy 9	<p><u>Planning Policy</u></p> <p>The most significant new development within the NP area is likely to be the May Gurney site. It is not clear how some of the requirements of this policy (e.g. around adequate parking or for flexible work space) might work within the limitations of Policy 3.</p> <p>Re. the second paragraph, ‘supported’ is considered a stronger term than ‘encouraged’. The group may wish to replace this word.</p>	The extant permission on the MG site is for residential, this focuses on community facilities.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Paragraph 3 – how would a developer demonstrate that their proposal will enable wider community use of an existing sports facility (other than by virtue of an increase in population)?</p> <p>Paragraph 4 – The reference here to ‘DC.3’ is a little unclear. It presumably references the relevant section of the Design Code, but some additional reference text would be helpful. The references to enhanced access to open spaces (incl. signage etc.) and improving links between assets read more as projects / community aspirations than planning policy.</p> <p>Paragraph 5 – this feels like it should belong in Policy 2: Design.</p>	<p>Change encouraged to supported</p> <p>Para 3 specifically relates to proposals for new community buildings or a proposal for the existing sports hall.</p> <p>Added additional reference to design codes</p> <p>Removed para 5 from the policy</p>
Figure 20	<p><u>Ecologist and Biodiversity Officer</u></p> <p>Promoted routes have been mis-identified in the plan and evidence document as Public Rights of Way – this should be amended.</p>	<p>Map was taken from the AECOM design codes, now removed as feedback provided that this was misleading/ unclear.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	 <p>merging development</p> <p>Integrate SuDS with infrastructure features and hedgerows to at connectivity across</p> <p>Legend:</p> <ul style="list-style-type: none"> Trowse with Newton Conservation Area Former May Gurney Site Parish Boundary Grade II Listed Crown Point Park County Wildlife Site Local Nature Reserve Other Conservation Area Grade I & Grade II Listed Building Priority Habitat / Woodland Public Rights of Way (PbW) A146 Fly-Over Potential Green Infrastructure in Mitigating Flood Impacts Potential School Zone Extended Ecological Network Potential Access Point Improved Whittingham Lane Potential Public Rights of Way & Green Corridor Existing Public Rights of Way & Green Corridor Potential Landscape Buffer <p>Green Infrastructure officer</p> <p>This map is trying to show a lot of information. It would benefit from being produced at a larger scale, or alternatively splitting this into two maps, making the detail less congested.</p>	
Policy 11	<p><u>Planning Policy</u></p> <p>It would be beneficial if this Policy referred to links to wider facilities, particularly links to Norwich either as part of the existing network or via the redevelopment of the May Gurney site.</p> <p>Re. 2nd paragraph – is it reasonable to expect all development proposals to demonstrate how cycling, walking and wheeling will be promoted (including, for example a property extension, or the development of a single dwelling)?</p>	<p>Added reference to wider facilities in Norwich.</p> <p>Para 2, clarified that this relates to new built development and excludes</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	The final paragraph is quite vague (how are 'reasonable opportunities' defined? Who will need to take them?). This is also more of a project than a planning policy.	householder extensions. Deleted the word 'reasonable'
Figure 22	<u>Senior Heritage & Design Officer</u> The on plot garage example used in this figure does not meet parking standards so should be removed to avoid confusion.	Disappointing as this comes from the AECOM design codes document, but if it doesn't meet parking standards it should be removed. Removed it.
Appendix B	<u>Ecologist and Biodiversity Officer</u> It would be useful to see bird and bat boxes and insect bricks being incorporated within the design guide.	It's too late to change the design code now
Non Designated Heritage Assets assessment	<u>Senior Heritage & Design Officer</u> It is good to see a thorough Non-designated heritage assessment. The 'estate cottages' along Whitlingham Lane are listed as such but not identified individually. As there are numerous dwellings along the lane it would be good to clearly identify exactly which houses are considered to be included as NDHA otherwise it leaves it open for interpretation. The same applies to the police station houses – and although the estate is mentioned, only one house is referenced (the Old police house now Copper Penny on the Street) Clarification is needed as to whether the NDHA/Police houses referred to are the houses in Newton Close?	Agree remove the boatyard as the NDHA. Decision not to expand the list of NDHAs at this stage in the NDP process.
Design Code	<u>Senior Heritage & Design Officer</u> P20 – the railway station and the historic pumping stations are now all grade II listed so this need to be updated from Local listing. As per NP the on plot garage example on p37 is not workable and does not meet parking standards – having one parking space apart from the garage for quite substantial 3+ dwelling. It also refers to Broadland District Council standards when in South Norfolk.	We have considered the point made about rural edge / natural landscape approach at the end and change in the NDP where needed. Unfortunately, it's not possible to

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>P38 – the diagram of a rear parking court is not a very good one as it is not well overlooked and is not large enough for adequate turning space. It doesn't meet the criteria in the adjacent green box – suggest it is omitted as figure 34 is a much better example to show.</p> <p>As discussed in the comments for the May Gurney site, there is some inconsistency between the code and NP – e.g. the former advising “any new development should maintain the variety in building typologies that already exist in the area (detached, semi-detached, terrace houses.) This does not match with the NP advice.</p> <p>Page 46 – figures 44 & 45 does not show a good/acceptable approach to infill development i.e. cramping the street-scene where spacing between dwellings is part of the character of the street.</p> <p>In the design guide and code there are good sections on the relationship of new development to natural and landscape features This is a better descriptive approach to guiding development rather than the rural edge of the village and distant past use as an agricultural area as mentioned in the NP. The NP should tie in and be more consistent with the design code rather than suggesting and introducing different ideas. This is especially the case for May Gurney site where there is a specific design code/guide for this area on p74-78.</p>	<p>change the Design Codes at this stage so cannot update the listed status of pumping station/railway station.</p>
LGS Document	<p><u>Planning Policy</u></p> <p>Not all of the listed sites have photographs. This might help when trying to evidence the importance of the area.</p>	<p>All LGS now have photos.</p>
Important Views	<p><u>Planning Policy</u></p> <p>Again, there appears to be discrepancies on the spelling of Russel/Russell Terrace.</p> <p>View 7 is not on the map on page 2.</p> <p>In section 2.2, view 2 does not have anything in the rarity section. Is this intentional?</p> <p>In view 4 on page 7 – ‘allotments recently updated by the’ should be ‘allotments have recently been updated by the’</p>	<p>Updated accordingly</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Evidence Base	<p><u>Planning Policy</u></p> <p>Page 26 – there are a couple of typos in the third paragraph that need amending, ‘are’ should be ‘area’ and ‘which intensifies of extends’ needs rewording.</p> <p><u>Ecologist and Biodiversity Officer</u></p> <ul style="list-style-type: none"> • GI Principles <ul style="list-style-type: none"> ○ The Government have just launched https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework - esp. principle 3 ○ this may also be of interest http://www.greeninfrastructurenw.co.uk/resources/North_East_Green_Infrastructure_Planning_Guide.pdf) • The strategic GI corridor already exists (but it is in the emerging GNLP). There is a B-line over Trowse too. These should perhaps feature in Chapter 9 of the Evidence Base. • I would encourage further consideration of what you want GI to provide, and provide deeper justification for the identification of the GI corridor shown in Fig 13 of the Neighbourhood Plan. There may also be benefit to improve existing management in the CWS to make them the best they can be. • Consideration could also be given to the nocturnal environment – and where dark corridors must be maintained. 	Updated accordingly

Historic England

Stakeholder comments to the Regulation 14 consultation	NDP Response
Welcome the strong emphasis on conserving and enhancing Trowse's historic environment. The plan meets the Basic Conditions in relation to the historic environment.	Noted

National Grid

Stakeholder comments to the Regulation 14 consultation	NDP Response
National Grid identifies there are several National Grid assets falling within the NP area and provides guidance in relation to development that is close to their infrastructure.	Noted.

National Highways

Stakeholder comments to the Regulation 14 consultation	NDP Response
No specific comments on this draft neighbourhood plan	Noted

Natural England

Stakeholder comments to the Regulation 14 consultation	NDP Response
No specific comments on this draft neighbourhood plan	Noted

Norfolk Constabulary

Stakeholder comments to the Regulation 14 consultation	NDP Response
Suggested that all future planning applications should work towards achieving the Secured by Design Awards, which aims to achieve a good standard of security for buildings and the immediate environment. Further guidance is provided in relation to this in the response.	<p>Included reference to this in the design section of the NDP with footnote links to the Secured By Design website and design guide for all developments.</p> <p>Added crime and disorder aim to the NDP and added in extra wording suggested around development expecting to contribute towards the improvement of local services and infrastructure like the police.</p>

Norfolk Rivers Drainage Board

Stakeholder comments to the Regulation 14 consultation	NDP Response
Part of the parish falls within the IDD of the Norfolk Rivers Internal Drainage Board and therefore the Board's Byelaws apply. Further background on this provided. Response notes a number of factors to be	Para added in relation to the role of the IDB and sentence in Community Action 2 also.

Stakeholder comments to the Regulation 14 consultation	NDP Response
aware of to ensure no conflict between the planning process and the Board's regulatory regimes.	

Norfolk County Council

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
Lead Local Flood Authority	<p>LLFA welcome references to flood risk and SuDS. The LLFA recommend:</p> <ul style="list-style-type: none"> • Including reference to ground water flooding • Including para 69 within policy 4 on Green Corridors • Referencing the LLFA Statutory Consultee for Planning Guidance Document • Including further detail of flood events, which they have provided info for • Map of EA Flood Zones and surface water flooding is included in the plan 	Included as recommended
Minerals and Waste	<p>It should be noted that the following LGS designations are underlain by sand and gravel resource:</p> <ul style="list-style-type: none"> • Blockhill allotments 	This should not prevent their inclusion as LGS, though it should be noted that should an application be submitted for built development on these sites, policy CS16 will apply. Recommend clarifying this within the supporting text.

Norfolk and Waveney Integrated Care System – ICS Estates Department

Stakeholder comments to the Regulation 14 consultation	NDP Response
The ICS supports section 7 of the plan which focuses on community infrastructure and supporting physically active and recreational opportunities. Recommend that as there is no GP practice in Trowse that the wording in relation to policy xx is amended to acknowledge that residents will be using local surrounding healthcare services and GP practices and that CIL could be made available to the ICS to bid on following the normal CIL bid processes.	Added some text about residents using services outside of the parish.
Support wording being included in Policy 9 that relates to health being a potential use of a new community hub	Included in the policy
Community action 3 – recommend expanding the scope of this so that it relates to the nearest healthcare facilities outside of Trowse, to ensure that healthcare is accessible for all patient groups	Decision not to include particular services within the action.

Recommend including a statement that confirms Trowse PC will support the ICS in ensuring suitable provision of healthcare services for the residents of Trowse.	Added this in following the text relating to residents accessing services outside of the parish.
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The Norfolk Gardens Trust

Stakeholder comments to the Regulation 14 consultation	NDP Response
Support the view of Historic England who 'strongly advise that the conservation and archaeological staff of the local authorities are closely involved throughout the preparation of the plan and its assessment'.	Noted
Welcome the high level of importance that the neighbourhood plan affords to the protection of heritage assets and their setting. Recommend consideration of conserving historic landscapes that are not registered but have a local heritage importance as these lack the statutory protections given to registered sites.	A number of such sites – cemetery for eg are designated as local green spaces in the NDP.

Local Stakeholders

Principle Planning on behalf of Crown Point Estate

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 7: the plan has the incorrect location / photo for View 6. This point is not a public route, just a permissive path.	Agreed, decision to remove this view from the plan
Policy 11: Alternative route suggested for the cycle links identified	Included the suggested alternative
Policy 14: The photos here are of the rowing clubhouse, not the boatyard. Argued that the clubhouse does not have any historic merit.	Agreed to remove the boatyard as NDHA

Maddox Planning on behalf of Serruys Property Company

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 3 fails to consider the extant permission for the former May Gurney site and approved parameters of this. The policy wording should be updated to reflect this. The wording of the policy is too descriptive in setting out design requirements, there should be a greater level of flexibility.	Permission should respond to policy rather than the other way round.

Feedback from Landowners of Local Green Spaces

No feedback was received from landowners of Local Green Spaces as part of the Regulation 14 consultation.

Feedback from Residents

Housing Policies

Summary of Comments	NDP Response
Parking/access to the school should be more of a focus in the plan	Access to the school is mentioned in 102 and in policy 11 on sustainable transport, but only in the context of new signage. Not really something we can tackle as part of the NP.
Enabling younger people to remain or move into the village should be a key priority that is addressed through Affordable Housing policy. The plan lacks this.	The provision of affordable housing is considered in para 22-23. It is anticipated that the affordable housing delivered as part of the White Horse Lane development will provide sufficient to meet the current identified needs so a decision was made not to allocate for additional affordable housing within the village.
Achieving high quality design of new development is critical	Agreed, which is why we have Policy 2 on Design and Policy 3 which relates specifically to the May Gurney site.
The former May Gurney office building should be sympathetically restored	The NDP identifies this as a non-designated heritage asset to help ensure this happens.
There should be more emphasis on carbon reduction measures	Added some text after the vision and objectives for the plan
Support for the model village approach being central to future development plans	Noted, this is a big part of the vision for the NDP

May Gurney Site Policy

Summary of Comments	NDP Response
Essential that this site is redeveloped in a sensitive manner that is in keeping with the rest of Trowse	Agreed, which is why we have Policy 3 relating specifically to development of the site
Concern about the impact of additional road traffic through Trowse following development of the site, could this be addressed in the policy?	Para 41 – statement added on the impact traffic is likely to have on the character of Trowse and that residents are not in support of this being the main entrance to the development.
Concern that development of this site will have a negative impact on the local environment, wildlife and nature	Noted, which is why there is a section in the policy on green infrastructure
Suggestion that there should be a community action relating to ensuring that the site becomes part of Trowse	Decision not to include this.
Support for development of the site as at present it encourages antisocial behaviour / is unattractive	Noted

Could development of this site help address parking issues in Trowse?	Potentially if it included a public car park, but the current planning permission does not include this
Support for retaining a green area between the development and Trowse village	Agreed, which is why we have Policy 6 Strategic Gap

Natural Environment Policies

Summary of Comments	NDP Response
The Trowse Church Meadow LGS includes the church car park, which is no longer a green space, but compact mud. This should be reflected in the assessment.	Noted, but managed constraints are in place on the car park to keep it green.
Community action to restore the muddy area of the Trowse Church Meadow proposed	This is not an issue for the Neighbourhood Plan to address.
Suggested that there should be community actions for section 6.2-6.4	Decision not to include community actions around these points.
Suggestion that there should be an action to minimise clutter on Trowse Common	This is not an issue for the Neighbourhood Plan to address.
Additional suggestion of Trowse Woods as a Local Green Space	This is already a County Wildlife Site and too large to be included as a Local Green Space.
The photo of View 7 needs checking	Decision to remove this view as the viewpoint/photo do not match up and the viewpoint as it stands is taken from private land.
Suggestion that the strategic gap should extend both sides of the river, which would include part of the May Gurney site	The May Gurney site is allocated in the Local Plan and has planning permission, it is not possible therefore to extend the strategic gap into this area.
Support for tackling flood risk issues	Noted
Could the policies include 'must' rather than 'should'	We want to have as strong an influence over planning decisions as possible, however, the use of the word must within development plan policies is generally inappropriate as everything in planning policy is negotiable through the development management system, dependent upon development viability etc.

Community and infrastructure policies

Summary of Comments	NDP Response
Support for bringing back a shop in the village	Noted

The old primary school would make a great community hub, consisting of a library, information centre, café. As the village grows more facilities will be needed	We welcome a community hub in the village, regardless of where it is, YMCA, church hall, old school.
Support for policy 10 and broadening recreational activities down Whitlingham Lane	Noted

Transport policies

Summary of Comments	NDP Response
The supporting text could be updated to reflect new parking /working arrangements at County Hall, there is no longer an issue with County Hall staff cars overrunning the village.	Group feel that this is not true, especially as at County Hall they've started to lease floors to other organisations, which will create the problem again. Continue to be a parking issue.
Suggestion that the parking difficulty in Trowse is not with visitors to the football/County Hall/Whitlingham, but residents of the terrace houses and visitors to services in the village, all competing for the same insufficient spaces.	Everything contributes, so terrace houses competing for spaces as well as county hall etc.
Make the wording of Community Action 6 stronger – identify a location for, and deliver, additional off-road parking for a minimum of xx cars, to be made available to all	We did discuss locations when developing the plan, but there isn't anywhere obvious. We're not able to identify a site at the moment.
Important that new homes have adequate parking to ensure the issues relating to parking are not worsened through new development	Noted.
A more direct cycle route to the city centre is needed, could this be included in the plan	This would be a good thing, but this is not really something that would be delivered within the NP area. NCC has LCWIP and this includes a link between Trowse and the city, we make sure that we connect up to this, we will be complementary to the wider LCWIP, in our patch here's the network that links in with this.
Recommended that further speed restrictions are introduced to ensure safer crossing for children accessing the school	This is not really planning policy, however, would fall under community action 5 relating to traffic management. Support and encourage speed restrictions – add this to CA5.
Objection to the proposal to create a new cycle route on land immediately behind properties on Julian Drive due to loss of	This is in the plan to encourage permeability – the more routes the better, however, removed the short link as requested..

Summary of Comments	NDP Response
amenity for residents, impact on local wildlife/habitat and the A47 embankment.	
The plan should include more support for sustainable transport measures	Policy 11 relates to sustainable transport, as do community action 3 and 4. Added in a link to the wider NCWIP as this is missing at the moment.

Heritage policies

Summary of Comments	NDP Response
Is the photo on p61 correctly labelled? Is this a Newton Close House	These are photos from the AECOM design guide, and we're not able to amend that now.
Is this not covered in existing planning policy	There is protection for non-designated heritage assets in national policy, what the NDP does is identify the NDHAs that are important to local people.

Appendix A: Stakeholder Email

From: Kate Leggett <trowsepc@outlook.com>

Sent: 16 December 2022 17:53

To: |

Subject: Trowse Neighbourhood Plan Reg 14 Consultation

Dear Sir/Madam

Trowse Parish Council are now consulting on the Regulation 14 draft of the Neighbourhood Plan. This will run for 8 weeks from Monday 16th December 2022 to Sunday 12th February 2023. A link to Trowse Parish Council Neighbourhood Plan webpage is below:

<https://trowseparishcouncil.norfolkparishes.gov.uk/neighbourhood-plan/>

The plan is available on the parish council website or in hard copy from the Manor Rooms. There will be a drop-in consultation event at the Manor Rooms on Saturday 14 January from 11-2pm which will be an opportunity to find out more about the plan and talk to those involved in developing it. The Manor Rooms address is The Street, Trowse, NR14 8ST.

Please provide your feedback on the draft plan via the online survey <https://www.smartsurvey.co.uk/s/Trowse/> or by contacting the Parish Clerk on trowsepc@outlook.com

Kind regards

Kate Leggett
Clerk to Trowse Parish Council

Trowse with Newton Parish Council, The Manor Rooms, The Street, Trowse, NR14 8ST. Telephone: 07899798853

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