



# **Lingwood & Burlingham Neighbourhood Development Plan Consultation Statement**

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## **Introduction**

### **Overview of the Lingwood and Burlingham Neighbourhood Plan**

1. Lingwood and Burlingham 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 Lingwood and Burlingham 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 Lingwood and Burlingham 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 Lingwood and Burlingham 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. It should be noted that development of the neighbourhood plan also builds on significant work locally to develop a Community Led Plan. Consultation events took place at key points in the development process. A range of events and methods were used.

## **Early Engagement in Developing the Plan**

<b>Date</b>	<b>Activity</b>	<b>Summary</b>
August 2021	Parish meeting	Meeting locally with Broadland District Council to discuss the merits of undertaking a Neighbourhood Plan for the villages
September 2021	Area designation	Area designation approved by Broadland District Council
September 2021	Initial Steering group meeting	Membership of the group changed throughout the plan's development, comprising of around 8 people, a mix of parish councillors and residents. The steering group met on a regular basis throughout development of the plan, with minutes published on the website.
January 2022	Website launched	<a href="http://www.lingwoodburlingham.com">www.lingwoodburlingham.com</a> established and contains all documents, including minutes of steering group meetings, relating to the neighbourhood plan
February 2022	Communication & engagement plan developed	Plan developed to direct engagement activities as part of the neighbourhood plan's development, including key messaging and approaches.
March 2022	Publicity video	Short video launched on the website and Facebook site to help raise awareness and understanding of the neighbourhood plan
March 2022	Annual Parish Meeting	Presentation given on development of the neighbourhood plan
March 2022	Article in the Parish News	Article about the neighbourhood plan included within the Parish News which goes to all households in the neighbourhood area.
March 2022 – July 2022	Have your say consultation	Initial consultation on key issues for the neighbourhood plan, using a 'Have your Say' survey form
April 2022	Article in the Village Book	Article about the neighbourhood plan included within the Village Book which goes to all households in the neighbourhood area.
April 2022	Consultation event	Drop-in session at the Village Hall to help raise awareness of the neighbourhood plan and seek resident's views
May 2022	Leaflet sent to all households	Leaflet raising awareness of the neighbourhood plan and inviting people to two drop in consultation events sent to all households in the parish



Date	Activity	Summary
May 2022	Two consultation events	Consultation events held at the Village Hall to seek people's views relating to development
June 2022	Housing Needs Assessment	Housing Needs Assessment produced for the neighbourhood area by AECOM
June 2022	Design Codes Developed	AECOM were commissioned to develop design codes for the parish, included engagement with members of the steering group during visit to the parish
February 2023	Owners of Local Green Spaces informed that their land was being considered for designation within plan	Formal letters sent to all owners of Local Green Spaces.
February 2023	Consultation with the Statutory Environmental Bodies on the SEA/HRA Screening Assessment	Statutory consultation, facilitated by Broadland District Council, which determined a SEA/HRA appropriate assessment would not be required.
February 2023	Informal comments from Broadland District Council	Informal comments on the draft plan received from Broadland District Council, prior to Regulation 14 consultation

### Early Engagement – Summary of the main issues raised

9. The neighbourhood plan steering group focused on engaging residents, through drop in events, articles in the Village Book, the website, posts on Facebook, engagement with the local primary school and via a 'Have Your Say' form between February 2022 and June 2022. This was to understand what works, what doesn't, what's missing and key issues for the plan to address.

10. The main issues and concerns raised included:

- There is a really strong desire to retain the rural village feel of Lingwood and the Burlinghams.
- People like the community aspect of living in Lingwood and Burlingham and would like to see community facilities and local services retained.
- Residents feel there is a need to improve infrastructure, such as doctors, road network, broadband, and this should be a priority before new housing development.
- There is a strong desire from residents for a doctor's surgery in the parish.
- There is concern that much more development will affect the rural nature of the parish.
- Where there is development greatest need is perceived to be for 2 and 3 bed sustainable homes and bungalows/houses with design that reflects traditional country character.
- It is important that new homes are designed to a high standard, with environmental credentials, and fit with the character of the village.
- There is some concern about speeding and the narrowness of the local road network, but this is also acknowledged to be part of the character and what gives the place a rural feel.
- Access onto and across the A47 is a concern.
- There is strong support for protecting green spaces, trees and existing walkways.
- Access into the countryside is important, people would like to see more footpaths and walking/cycling routes.
- There is support for expanding local businesses, particularly those relating to service/hospitality such as cafes and pubs.

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

11. Feedback in relation to design, and particularly that buildings should be in keeping with existing characteristics 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.
12. Following feedback from residents on the importance of the local environment and preserving this, the steering group decided to designate local green spaces within the plan. The steering group considered the spaces suggested by residents during consultation and assessed these in line with national policy. Local Green Space owners were also formally written to, with their feedback considered in finalising the plan. As well as identifying important green spaces the steering group decided to develop green corridors for the plan, with these based on mapping evidence provided by Norfolk Biodiversity Information Service. The aim is for biodiversity improvements to be prioritised along these green corridors.
13. Access into the countryside is considered important to residents, and visitors to the parish. There is an extensive network of footpaths, particularly in North Burlingham. A policy around establishing a country park in this area was included in the plan to support additional improvements in this area. A map of walking and cycling routes, with proposed improvements to these, was also developed for the plan.
14. Feedback in relation to housing mix and type from residents was considered alongside a Housing Needs Assessment developed by AECOM to establish a policy that will ensure future housing more effectively meets local need.

## **Regulation 14 Consultation**

### **Overview**

15. The consultation ran for just over 6 weeks from 24 April 2023 to 4 June 2023.
16. 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
23 April 2023	<ul style="list-style-type: none"> <li>All relevant documents and link to the online survey were published on neighbourhood plan website.</li> <li>Hard copies of draft NDP were placed in the Village Hall</li> </ul>	<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"> <li>Completing an online survey.</li> <li>Filling in a hard copy of the survey or electronic version of the survey and sending this to the Steering Group Chairperson.</li> <li>Providing feedback via letter or electronically to the parish clerk.</li> </ul> <p>The NP documents made available as part of this process included<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>Regulation 14 version of the Neighbourhood Plan</li> <li>Design Guidance and Codes</li> <li>Housing Needs Assessment</li> <li>Local Green Space Assessment</li> <li>Views Assessment</li> <li>Evidence Base</li> </ul>
24 April 2023	<ul style="list-style-type: none"> <li>Emails and letters sent to stakeholders advising them of the Regulation 14 consultation and how to make representations.</li> </ul>	<p>An email or letter was sent directly to each of the stakeholders, including statutory consultees, supplied by Broadland District 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 24 April. A copy of this is provided in <b>Appendix A</b>.</p>
24-26 April 2023	<ul style="list-style-type: none"> <li>Leaflet distributed to all households in the parish</li> </ul>	<p>Leaflet providing all relevant details about the Regulation 14 Consultation were posted to all households in the parish. A copy of this is available in <b>Appendix B</b>.</p>
24 April 2023	<ul style="list-style-type: none"> <li>Posters</li> </ul>	<p>Posters were put up in key places throughout the parish advertising the consultation, providing all the relevant details.</p>
Various	<ul style="list-style-type: none"> <li>Facebook posts</li> </ul>	<p>Posts and updates provided on the Neighbourhood Plan Facebook page throughout the consultation period</p>
Various	<ul style="list-style-type: none"> <li>Consultation events</li> </ul>	<p>6 consultation events held at the Village Hall:</p> <ul style="list-style-type: none"> <li>Thursday 11 and 18 May 9am-4pm</li> <li>Friday 12 and 19 May 2pm-8pm</li> <li>Saturday 13 and 20 May 9am-8pm</li> </ul> <p>In total 87 people attended the events.</p>

<sup>1</sup> <http://lingwoodburlingham.com/documents.html>

## Feedback from Regulation 14 Consultation

17. Ten stakeholders wrote to the steering group with their comments on the draft plan, either in letter or email form. In addition, 26 residents responded to the online survey.
18. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.

### Statutory Stakeholders

#### Anglian Water

Stakeholder comments to the Regulation 14 consultation	NDP Response
<b>Policy 4:</b> Policy welcomed. Could include a more ambitious water efficiency standards to help reduce potable water use in homes by 100 litres per person per day through a fixtures and fittings-based approach.	Support this as an aspiration in the supporting text, but not the policy. Too detailed for the policy. Referred to the Governments Environment Improvement Plan they attached in their response.
<b>Appendix B:</b> the design checklist could include 'positively integrate energy <b>and</b> water efficient technologies	Added as suggested.
<b>Policy 8</b> Agreed that the policy provides scope for AW to undertake operational development where needed	Noted
<b>Policy 10:</b> Supports the aims of the policy.	Noted

#### Broads Internal Drainage Board

Stakeholder comments to the Regulation 14 consultation	NDP Response
Part of the parish falls within the Internal Drainage District of the Norfolk Broads Internal Drainage Board and therefore the Board's Byelaws apply. Further background on this provided. The response notes a number of factors to be aware of to ensure no conflict between the planning process and the Board's regulatory regimes.	Added this background into the supporting text for policy 10.

#### Broadland District Council

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General Comments	<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.</p> <p>Please ensure that all maps and figures through the documents have the correct titles and sources referenced. It would also seem that the references to figures within policies and the numbering of figures has gone out of sync and needs to be reviewed. This has been highlighted in some of our comments but we have not detailed them all.</p>	Reviewed figures/maps etc accordingly



Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Vision, page 7	<p>Should 2040+ actually be 2042 in line with the end date of the Plan?</p> <p>Also, the phrase 'self-determined plan' seems at odds for the vision, perhaps switching for 'aspirations' or something similar?</p>	<p>Updated vision date.</p> <p>Replaced self-determined with aspirations.</p>
Objectives, page 7	<p>Just a note on phrasing – objectives B and C are worded more as vision statements than objectives. Suggest amending to 'B. Ensure that development contributes to...' and 'C. Protect the countryside and ensure that public open spaces are utilised...', or similar.</p> <p>In addition, objective A reads slightly oddly. Is there a particular, objective reason as to why newcomers and youth have been specifically mentioned? Should the preservation of local heritage not be of concern to the whole community? There may be people that have lived in the parish for several years who are not familiar with its heritage. The term 'residents' could be used as an alternative.</p> <p>In addition, given objective A, it is noted that there are no policies directly dealing with heritage within the plan (either listing non-designated heritage assets or otherwise). Was this the intention?</p>	<p>Amended Objective B and C.</p> <p>Objective A – reworded to all residents, including newcomers and the youth. This objective is delivered through protection of green spaces and views.</p>
Para 21	Following amendments made to the Plan, paragraph 21 is missing from the numbering.	Updated
Para 34, page 13	Should 'wealth' read 'wealthy'?	Updated
Figure 9, page 13	For clarity, it would be helpful if Figure 9 could be arranged so that it fits on one page, rather than being split over two.	Amended
Policy 2, page 17	<p>The tenure split of 55:45 is based on the HNA findings, but it should be noted that it may result in a further reduction in affordable rented units.</p> <p>We would advise against specifying the percentage mix of FH and S/O as this avoids committing to delivering an exact percentage of the Affordable Home Ownership as First Homes tenure. If you want to reference this in the policy then a potential amendment would be 'which may include First Homes and Shared Ownership (or other such discounted ANO tenures)'. This would help as some registered providers prefer delivery of Shared Equity which is also discounted to 50-75% OMV.</p> <p>The above wording does not tie you irreversibly to delivering fixed percentages of FH or S/O. In addition the inclusion of First Homes may then mean some RP's will not wish to take the remaining rented and shared ownership affordable homes (First Homes are usually</p>	<p>Incorporated the suggestion so that the text reads 'which may include First Homes and Shared Ownership'</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	delivered direct by the developer and entails a more complicated approvals and conveyancing process compared to other AHO tenures).	
Policy 3, Page 22	<p>The Steering Group previously consulted the Council on an informal draft of its plan. This policy did not form part of the informal draft. As such it appears that the policy has been included as a response to the consultation on a potential site allocation for a gypsy and traveller site through the Greater Norwich Local Plan. This view is given further credence by reading the introductory text to the policy, and in particular paragraph 51.</p> <p>Paragraph 51 States that there were a number of concerns locally about the impact of this site. The plan does not however elaborate on what those concerns were or evaluate whether they were valid and required a policy response. Nor was the Council able to identify such information as part of the supporting documentation. The Council would strongly recommend that such work is undertaken to justify the inclusion and content of any policy on Gypsy and Travellers.</p> <p>It is also slightly unclear why the title of the policy refers to “campsites”. There is some brief reference in the introductory text to holiday or visitor campsites. Despite its title, the policy as drafted would not apply to tourist campsites. However, the Council does not think that it is actually the intention in this case.</p> <p>Rather, the intention of this policy would appear to be solely about sites for Gypsies and Travellers and Travelling Showpeople. Although in this instance introductory text does not appear to consider the needs and/or demand for the needs of Travelling Showpeople separately, with reference only being introduced in the policy itself.</p> <p>On the basis of the assumption that this policy has only been included in reaction to the GNLP consultation on Gypsy and Traveller sites, the Council would recommend that the Steering Group may want to keep this section under review, pending decisions in relation to the Greater Norwich Local Plan (GNLP). This is because decisions are due to take place in mid-June in respect of which proposals for Gypsy and Travellers sites are taken forward. This may change what the Council proposes in terms of allocation sites for Gypsy and Travellers.</p> <p>If the Steering Group considers it appropriate to retain a policy on Gypsies and Travellers then the Council consider that the current policy would need to be modified and</p>	<p>This is an important issue for the community, and they would like to retain a policy, even though a site is no longer being allocated within the parish as part of the GNLP. Decision made to reword the policy so it’s less specific about a particular site.</p> <p>Heightened awareness of GRT sites given the consultation that was underway at the time of developing the plan.</p> <p>Decision to retain reference to campsites in the policy, wording slightly updated to reflect comments. Supporting text now addresses campsites, as well as the acknowledging that many temporary campsites fall under permitted development rights for up to 28 days.</p> <p>Added details of the resident concerns from the PC meeting minutes where 300 people attended the meeting and 200 people signed a petition due to local concerns of the proposed GNLP travellers site.</p> <p>Included reference to PPTS 2015 as recommended.</p> <p>Consideration of the points raised in relation to criteria A, C, E, F and I, with these removed from the policy.</p> <p>Updated criteria B in line with comments, adding reference</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>also that some useful further contextual information could be added to the policy's introduction.</p> <p>Specifically, it is recommended that the Government's Planning Policy for Traveller Sites (PPTS) 2015 is cited directly in the introductory section. For example paragraph 46 could be augmented by directly referencing paragraph 3 of the PPTS that states: "The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community."</p> <p>This helps reinforce the importance of promoting the good quality development for the mutual benefit of the settled and travelling communities.</p> <p>As well as setting the right context for the policy, the Council would also recommend some revision to the criteria of the policy to ensure they conform to the NPPF, PPTS (2015) and other relevant guidance and legislation.</p> <p>In this regard the following comments are provided in respect to specific criteria included in the policy:</p> <p>Criterion:</p> <p>a) In this first instance, the plan does not clearly define how anyone might go about demonstrating that an integrated co-existence will be achieved through an application for planning permission or what would need to be demonstrated. Therefore, on the basis of the information before it, the Council considers that the criterion fails to comply with paragraph 16(d) of the NPPF, which requires that "policies are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals".</p> <p>More significantly however, the Council is concerned that this criterion, as drafted, could be read as requiring a particular ethnic group to justify that their traditional way of life is compatible with the interests of the wider community, and that said group will need to demonstrate this in order to justify the grant of planning permission to meet their housing needs in a manner that isn't applied to other groups within the community. The Council is concerned that this approach would appear to start with the assumption that there is an incompatibility between the way of</p>	<p>to the Identified need or personal circumstances of gypsy and traveller accommodation. The policy does not list all the PPTS guidance, which would need to be a consideration in determining applications already.</p> <p>Reworded criteria G, H and J to reflect comments.</p> <p>Not intended that the policy is discriminatory, with updates made to ensure this is not the case. Sufficiently addressed the issues relating to equality.</p>

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	<p>life of Gypsies and Travellers and that of the settled community and also creates an imbalance in the requirements for the granting of planning permission for housing for different groups. As such the policy risks leading to direct and/or indirect discrimination under the Equalities Act 2010. Consequently, the Council's initial view is that this criterion is inappropriate and is not convinced that this type of policy is what is intended in the PPTS when it references policies that "promote the peaceful and integrated co-existence between a site and the local community. Rather this should be achieved through the inclusion of positively worded policies that enable the delivery of available, suitable and deliverable sites for gypsy and traveller pitches.</p> <p>In considering the above comments and any amendment or revision to the policy, the Council would strongly recommend that the Steering Group undertakes an Equalities Impact Assessment to ensure that the impact of the policies of the plan on those with protected characteristics is properly understood and taken into account in the preparation of the plan and also that the Steering Group complies with its responsibilities under the public sector equalities duty.</p> <p>b) The first clause of this criterion relates to the need for gypsy and traveller accommodation. The Council agrees that the existing level of local provision and need for sites is clearly a relevant matter. However, the PPTS also makes clear that consideration should also be given to: the availability (or lack) of alternative accommodation for the applicants; other personal circumstances of the applicant and local specific criteria where there is no identified need for plots/pitches. This indicates the assessed need is only one element to be considered amongst these other factors. If the neighbourhood plan wishes to reinforce a particular aspect of the PPTS guidance then further clarity should be provided as to why it is appropriate to reinforce that aspect but not include other aspects.</p> <p>c) The Council is unclear what the plan means by the term "over-concentrated", how it would be judged or how this term and associated references to sites being disproportionate in size relates or differs from the requirements in criterion b in regards to dominance. On this basis the Council has concerns that the criterion fails to comply with paragraph 16(d) of the</p>	

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>NPPF. With this and other criterion consideration should also be given to paragraph 16(f) of the NPPF which seeks to avoid unnecessary duplication of policies.</p> <p>e) Whilst paragraph 20 of the PPTS states that LPAs should not permit mixed use on rural exception, para 13 sets out that policies should, amongst other things, “reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability”. In addition, para 18 encourages mixed residential and business uses in other circumstances. In the context, the policy as drafted would appear to go beyond national policy in this respect. Whilst it may be justified to go beyond national policy, clear and compelling justification would be required. The Council was not able to identify such justification. As such the criteria as drafted would appear to be inconsistent with national policy and therefore the basic conditions. It is unclear how this policy could limit business uses on “near-by” land where such a proposed use would otherwise be consistent with the Development Plan’s policies on rural employment. It is not clear how a specific exclusion for business uses undertaken by gypsy and travellers that would not apply to other rural business operators could be justified. The Council would recommend that the Steering group revises or considers removal of this element of the policy.</p> <p>f) The Council would recommend that the policy is amended to make clear what is meant by the reference to safety. Matters relating to pollution appear to be addressed in criteria g. Matters relating to highway safety appear to be addressed by criteria (j). It is unclear what other hazard or other locally specific safety issues are intended to be addressed by this reference.</p> <p>g) This would this be better phrased “would not be likely to result in significant harm being caused to the health, well-being or living of future occupiers or neighbouring residents by way of noise ... “</p> <p>h) Should this read “... and other important features of the natural or built environment that ...”</p> <p>i) If, for the purposes of clarity and ease of use, the Steering Group wishes to cross reference by way of</p>	



Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>this criteria other policies within the plan then those that are most relevant should be specified within the policy. In determining a planning application, it will be necessary to have regard to all relevant policies within the adopted Development Plan (including adopted Neighbourhood Plan policies) therefore general references to needing to have regard to other policies is unnecessary and does not serve a clear planning purpose.</p> <p>j) In general, the Council is supportive of the criteria. However, the Council would note however that it is not uncommon for sites for Gypsies and Travellers to be located in more rural locations on the fringes of existing settlements. It is also the case that opportunities for sustainable transport (including pedestrian access) will vary between urban and rural areas. Therefore, it may be more appropriate for the policy to set out that Policies should have safe vehicular access and be located so as to reduce the need for long-distance travelling to access services and facilities.</p>	
Policy 4, page 30	<p>We previously commented that some of these requirements feel too prescriptive (e.g. reference to the building line, garden areas and (g) for example doesn't appear to have regard to permitted development. With reference to point (a) – typically development takes into account density closest to the proposed development site to ensure that it integrates effectively/appropriately.</p> <p>'The Design Codes and Checklist set out in Appendix B will be used to help assess all planning applications ...' – There is a concern that the checklist should be proportionate to the scale of the proposal and that it is too detailed for the scale of development likely to come forward in the neighbourhood area. In addition, the requirement for all applicants to complete the checklist would seem to add a disproportionate requirement into the planning process that doesn't appear to be justified. We feel that the second paragraph of the policy (and the introductory wording in Appendix B) should be re-worded to state that applicants should take account of the Design Codes and the Checklist in formulating their proposals.</p> <p>Whilst noting that this now reads 'should' instead of 'will', it still seems somewhat onerous and could be further tempered by making it clear that applicants are advised that they are only required to complete those sections that are of relevance to their proposals.</p>	<p>Decision to leave specific requirements in the policy, which is felt to have sufficient flexibility for applicants.</p> <p>Added that applicants are required to complete relevant sections of the design checklist.</p> <p>Used the suggested policy wording change for density.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>Policy 3 a. states “Density in new residential developments should take into consideration and respond to the low scale and low-density ranges across the settlement. A density beyond that range will not generally be acceptable.”</p> <p>We previously commented that this section of the policy does not fit in with NPPF Para 125, which states “a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. It is not appropriate for development to respond to the lower density areas as there is a mix of density across the area. In the later C20 development, the density looks to be quite high with quite a number of terracing. The wording is also a little ambiguous as it states a range across the settlement but does not adequately define that range.</p> <p>Whilst noting that ‘a density beyond that range will not be acceptable’ has been removed from point (a), we would still advise that ‘low’ is removed as the term is slightly ambiguous when trying to set context. Lingwood is comparatively higher density compared to parts of Burlingham for example. A possible suggestion could be “Density in new residential developments should take into consideration and respond to the existing scale and density of housing in the surrounding area and the local context.”</p>	
Para 67, page 31	<p>As stated in our previous comments, NCC parking standards were updated in 2022 to reflect use class changes. As such we do not consider that these do not conform to the NPPF. You can see the revised doc here <a href="https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/norfolk-parking-guidelines-2022.pdf">https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/norfolk-parking-guidelines-2022.pdf</a>. The NPPF also makes provision for maximum parking standards (para 108).</p>	Reviewed and updated para accordingly.
Policy 5, page 31	<p>With regards courtyard parking, where has the figure of 4 come from? What evidence is there for this? Is this from the design guide?</p>	<p>This was from the AECOM design guide (page 55). Referenced this.</p>
Policy 6, page 38	<p>With regards the last paragraph, it is unclear how this could be achieved and/or monitored. There are no planning control measures for this and in the majority of cases window and roof lights would be considered permitted development. We would suggest this paragraph is amended to include a sentence around lighting proposals that are likely to disturb or risk wildlife should seek mitigation to address this.</p>	<p>Updated policy accordingly with further reference to light issues for wildlife.</p> <p>Deleted the last paragraph.</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>This link might be useful in explaining the impact of external lighting on wildlife and the creation of dark buffers/corridors around development (see <a href="https://www.devon.gov.uk/environment/wp-content/uploads/sites/112/2022/02/Jan-2022-Final-Dark-corridors-for-bats.pdf">https://www.devon.gov.uk/environment/wp-content/uploads/sites/112/2022/02/Jan-2022-Final-Dark-corridors-for-bats.pdf</a> and could be a useful addition to the supporting text.</p>	
<p>Policy 7, Biodiversity and Green Corridors, page 43/44</p>	<p>There appears to be a lack of clarity as to the policy role of the identified green corridors. Paragraph 88 on page 41 states that the corridors are indicative, pending further investigative work. As these are suggested as a starting point for delivering BNG in the parish in point a), it needs to be clearer as to when/how the indicative corridors are defined in order to allow this policy to be applied.</p> <p>We previously commented on the draft plan regarding a mixture of native and non-native species as follows <i>“There are also many non-native species that are of value to our pollinators which could be considered. To ensure a mixture, if you require developments to use a certain % of native species in their soft landscaping plan (e.g. 80%) it is something which can be quantified and evidenced as part of the planning application.”</i> Following on from this comment the 80% figure has been incorporated into this part of the policy. The 80% reference was used as an example. Is there evidence that the group can add/reference in the supporting text to support this figure?</p> <p>With regards to the third paragraph, It would be helpful if there was some guidance on what ‘sufficient’ space looks like as this would be something that can be measured/easily secured. The woodland trust may be able to provide some help with this:  <a href="https://www.woodlandtrust.org.uk/media/43634/buffers-an-overview-factsheet.pdf">https://www.woodlandtrust.org.uk/media/43634/buffers-an-overview-factsheet.pdf</a></p>	<p>Removed reference to corridors being indicative.</p> <p>Note the comments regarding 80% - this was included following previous advice from the Council. Policy updated and no longer gives a specific % but development should aim to provide a higher percentage of native species compared to non-native species In the landscaping to provide missing habitat or pollinator options similar to what is present In the Norfolk Region. Footnoted the Norfolk Wildlife Trust website regarding species like plant, trees and terrestrial invertebrates which could be supported and encouraged In new developments.</p> <p>Sufficient space should be judged on a case-by-case basis and will depend on the site’s specific circumstances. A footnote has been added which provides useful guidance from Leeds City Council Which Incorporates other published data. It seems that sufficient space between 10m to 20m may be necessary for a number of tree species groups due to their ultimate spread.</p> <p>The Woodlands Trust guidelines state also that not</p>

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
		one size fits all so this is why a specific number is not going to be given to ensure flexibility on the approach taken in individual applications.
Policy 10, page 58	Whilst we can see that this policy has been amended following on from our comments on the draft, it is still not clear how this policy materially adds to existing policy and guidance at the national and local level. Neighbourhood Plan policies are expected to be 'distinct to reflect and respond to the unique characteristics and planning context or the specific neighbourhood area for which it has been prepared.' In addition, plans should avoid 'unnecessary duplication of policies that apply to a particular area'. For example, there is no mention within the policy of specific locations that are prone to surface water flooding.	Would like to leave the policy as it currently is and see what examiner says, other similar policies have been passed elsewhere
Policy 11, page 61	We previously commented on the draft policy as follows; Economic development is considered acceptable within the development limits but new facilities such as farm shops and cafes could be within or well related – why the difference? What if a business needs to expand premise size, but this is not an increase in workforce. This could limit economic growth. These comments do not appear to have been addressed, so they are reiterated here.	Group considered the points raised previously and decided to split out the point about generating new employment opportunities.  This would need to be in the planning statement – specify that this needs to be in the planning statement re the related to existing.
Community Action 3: CIL Money, page 63	This action relates specifically to CIL monies. Has any thought been given to other revenue sources being used for locally identified projects?	Added some text that indicates that other sources of funding will also be considered
Para 125, page 65	This paragraph could also refer to emerging GNLP policy 2 on sustainable communities	Added reference to Policy 2 in the appropriate paragraph.
Appendix C, page 82	Given that there is a separate LGS document and the need to try and make NPs as concise as possible, there is no need to duplicate this information here and instead could be moved to the LGS document, if it isn't already contained within it.	This information has been included in other plans which have been through examination, decision to leave it in.
Design Guide	The following comments were made with reference to the design guide alongside a draft version of the Plan. It doesn't appear that there have been any changes to the Design Guide, hence there inclusion again.  Policy SP 03 It would be better to not include "aim" to preserve and just state "preserve". Also, clearly state that new trees should be planted along new streets and as part of new developments. P56-7 does expand on planting new trees so it could be more strongly worded in the	The Design Guide was produced by AECOM and has been signed off by Locality, it's not possible to amend it at this stage

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
	<p>policy. Para 131 NPPF does state “Planning policies and decisions should ensure that new streets are tree-lined”</p> <p>BF- 03 – I would suggest “unless the existing character is of a varied building line. “ (this policy appears as quite an urban approach and promoting uniformity whereas in rural areas building line can be quite varied.)</p> <p>Page 64 is confusing as it states ‘maintain - and then demonstrates the building line is not consistent? Perhaps this policy should be “maintain consistent approach to the building line”?</p> <p>BF04 – Green or “brown” roof often have to be flat so this seems slightly contradictory to previous sentence. I think there should be some scope for modern rear flat roof extensions?</p> <p>BF05 p66 This seems inconsistent; “The building line can have subtle variations in the form of recesses and protrusions, but will generally follow a consistent line;” Figure 90 promotes a varied building set back in the form of recesses and protrusion and interest to the street scene. It is likely that a developer will take “a consistent building line” literally.</p> <p>P70 – The example figure 99 is not considered to be an acceptable design for infill.</p> <p>P76 shows a shed dormer – although on previous pages these are not encouraged. Seeing that a large part of the character of Lingwood is mid to late C20 housing estates with this more Scandinavian style housing would this design be an issue in these areas?</p>	

#### Historic England

Stakeholder comments to the Regulation 14 consultation	NDP Response
We welcome the production of this neighbourhood plan but note the document does not make reference to or make provision for assessment of the historic environment as part of your plan going forward.	Decision not to include a section on the historic environment as felt this was adequately covered in existing local and national plan policy.

#### National Grid

Stakeholder comments to the Regulation 14 consultation	NDP Response
There are no National Grid Electricity Transmission assets within the NDP area, therefore no impact is identified.	Noted.



## National Gas

Stakeholder comments to the Regulation 14 consultation	NDP Response
There are no National Gas Transmission assets within the NDP area, therefore no impact is identified.	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
<p>Recommended that the following is included within the plan:</p> <ul style="list-style-type: none"> <li>Objective 'create and maintain a safer community and reduce crime and disorder'</li> <li>A requirement that all new developments should conform to the 'Secured by Design' principles and the NDP will support development proposals aimed at improving community safety.</li> <li>Reference to CIL monies being used to support police infrastructure and enhance community safety.</li> </ul>	<p>Decision not to add another objective relating to this</p> <p>Added text on secured by design</p> <p>Added a bullet to CA3 which relates to community safety initiatives eg speed safety</p>

## Norfolk County Council

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
Lead Local Flood Authority	<ul style="list-style-type: none"> <li>Recommend including a surface water flood map for the entire parish</li> <li>Policy 10 could be expanded to include reference to the four pillars of SuDS</li> <li>A full review of flooding within the parish could be carried out to assess all source of flood risk, including surface water, groundwater, rivers, and ordinary watercourses. Some info provided to support this, including official records of flooding within the parish.</li> <li>Include reference in the text to the NCC LLFA Statutory Consultee for Planning: Guidance Document</li> </ul>	<p>Included surface water flood risk map of whole parish as recommended in the plan and evidence base document.</p> <p>A review of flooding has been included within the evidence base – updated with latest data provided by LLFA. The PC cannot get free access to any ground water mapping/details.</p> <p>Added reference to NCC guidance document.</p>
Natural Environment Team	<ul style="list-style-type: none"> <li>Management of mammals could be considered at a landscape scale – as there are high levels of deer population levels</li> </ul>	Not sure management of mammals is related to planning policy so decision not to include.

	<ul style="list-style-type: none"> <li>• There's a link between NCCs target to plant 1m trees and the ambition identified in Policy 13 around the Country Park</li> <li>• Policy 4 on Design supported</li> <li>• Policy 6 on Dark Skies supported</li> <li>• Policy 7 on Biodiversity/Green Corridors is well written. Recommended that reference is added to the Local Nature Recovery Strategy. Developers should be made aware that GI for public access and GI for biodiversity cannot always use the same space.</li> <li>• Policy 8 on Local Green Space supported.</li> <li>• Policy 9 on Key Views could be strengthened by requesting that any development interacting with these views is submitted with a LVIA.</li> <li>• CA1 provides a useful focus for the community</li> </ul>	<p>Noted, added reference to the 1m trees target.</p> <p>Included reference to the LNRS</p> <p>Noted that GI for public access and GI for biodiversity cannot always use the same space in the supporting text.</p> <p>Added requirement that an LVIA is submitted where proposals interact with any of the key views identified in Policy 9.</p>
Transport	<ul style="list-style-type: none"> <li>• Review Policy 5 in relation to NCC updated parking standards.</li> <li>• Note that to be considered a parking space, the internal dimensions of a garage should measure 7.0m x 3.0m as stated in the Parking Guidelines provided.</li> </ul>	Reviewed and updated accordingly

## Feedback from Landowners of Local Green Spaces

LGS	Summary of comments	NDP response
Lingwood Allotments	No response from the landowner at this stage.	N/A
Peters Diamond Jubilee Woodland	No response from the landowner at this stage.	N/A
Millennium Green, Lingwood	No response from the landowner at this stage.	N/A
Lingwood Village Hall Fields	No response from the landowner at this stage.	N/A
Lingwood Village Pond	No response from the landowner at this stage.	N/A
Clamps Orchard, North Burlingham	No response from the landowner at this stage.	N/A
The Green, North Burlingham	No response from the landowner at this stage.	N/A
Church Farm Orchard, North Burlingham	No response from the landowner at this stage.	N/A

## Feedback from Residents

### Housing Policies

Summary of Comments	NDP Response
Policy 1 Housing Mix: <ul style="list-style-type: none"> <li>• Achieving a balanced mix is important</li> </ul>	Noted, the policy should help to achieve this
Policy 2 Affordable Housing: <ul style="list-style-type: none"> <li>• Support for more affordable housing, especially to support younger residents remain in the community and get on the housing ladder</li> </ul>	Noted

Policy 3 Traveller Sites and Campsites <ul style="list-style-type: none"> <li>Feeling that there has been a lack of engagement with the community relating to the potential GRT allocation within the parish in the emerging GNLP</li> <li>Recognition that GRT sites need to be identified</li> </ul>	Noted with reference to the GNLP, however, this is unrelated to the NDP
Policy 4 Design: <ul style="list-style-type: none"> <li>Strong support for the policy and good design</li> </ul>	Noted, the policy should help to achieve high standards of design that reflect local characteristics going forward
Policy 5 Residential Parking Standards: <ul style="list-style-type: none"> <li>Suggestion that there should be additional parking by Millennium Green</li> </ul>	

## Natural Environment

Summary of Comments	NDP Response
Policy 6 Dark Skies: <ul style="list-style-type: none"> <li>Supported</li> </ul>	Noted
Policy 7 Biodiversity and Green Corridors <ul style="list-style-type: none"> <li>Strong support for this policy area</li> <li>Hedges should be enhanced</li> </ul>	Noted, hedgerows are identified within the policy for protection
Policy 8 Local Green Spaces <ul style="list-style-type: none"> <li>No comments</li> </ul>	
Policy 9 Protection of important local views <ul style="list-style-type: none"> <li>The countryside feel and natural environment is what makes the area special</li> </ul>	Noted, which is why we're protecting it within the neighbourhood plan
Policy 10 surface water flood risk and management <ul style="list-style-type: none"> <li>Drainage is such an important issue locally</li> </ul>	Noted which is why we have a policy around surface water flood risk

## Economic Development

Summary of Comments	NDP Response
Policy 11: Economic Development <ul style="list-style-type: none"> <li>Lack of support for industrial business coming forward</li> <li>Economic development is dependent on the amount of housing delivered</li> <li>Consideration of road access should be required in the policy</li> <li>Land on the edge of the villages could be used to create jobs</li> </ul>	The policy sets out what development would be supported, criteria for its development, such as requirement for access, is set out in other policies.

## Transport and accessibility

Summary of Comments	NDP Response
Policy 12 Improving walking and cycling routes <ul style="list-style-type: none"><li>Important to ensure that walking and cycling routes are accessible</li></ul>	Added the word 'accessible' after safe in the first para.
Policy 13 Burlingham Country Park <ul style="list-style-type: none"><li>Could this policy include a requirement for a footbridge over the A47?</li></ul>	Added - Development of a crossing point across the A47 to facilitate access to Burlingham Country Park would be supported.
Policy 14 Community parking provision <ul style="list-style-type: none"><li>Difficult to get the balance right around off road parking provision</li></ul>	Noted
General comment relating to community facilities/provision – there is nothing in the plan related to activities for younger people, including Scouts	Noted. Added a paragraph relating to the scout hut needed to relocate.

## Appendix A: Stakeholder Email

Lingwood and Burlingham Neighbourhood Plan Pre-Submission Regulation 14 Consultation

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○ Mike Ingram <mingram5510@gmail.com>

Monday, 24 April 2023 at 07:38

To: Mike Ingram

Dear Stakeholder

Lingwood and Burlingham Parish Council, as the qualifying body, are now consulting on the Pre-Submission Draft of the neighbourhood plan for Lingwood and Burlingham. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of 6 weeks from 24th April 2023 to 4th June 2023.

The consultation offers a final opportunity for you to influence the neighbourhood plan before it is submitted to the Broadland and South Norfolk District Council.

All comments received by 4th June 2023 will be considered by the Neighbourhood Plan Steering Group and may be used to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Plan at a future date.

The Pre-Submission Plan and supporting evidence can be found online at [lingwoodburlingham.com](https://lingwoodburlingham.com)

Should you wish to provide comments you can send these to Mike Ingram via email at [mingram5510@gmail.com](mailto:mingram5510@gmail.com)

Yours faithfully

Mike Ingram Steering Group Chairperson

Lingwood and Burlingham Neighbourhood Development Plan



## Appendix B: Consultation Leaflet



### LINGWOOD & BURLINGHAM Neighbourhood Development Plan

Come and see  
how input from you  
has been fed into a  
40-year Plan for  
this Parish.

The Plan represents community guidance  
that future councils and developers  
would be required to follow. For example:  
guidance that has to be followed if  
developing travellers sites etc\*.

#### **COME AND SEE THE DRAFTED NEIGHBOURHOOD PLAN at LINGWOOD VILLAGE HALL upstairs function room**

(fully accessible by wheelchair or pushchair in lift)

**Thursday 11<sup>th</sup> and 18<sup>th</sup> May 9am – 4pm**

**Friday 12<sup>th</sup> and 19<sup>th</sup> May 2pm – 8pm**

**Saturday 13<sup>th</sup> and 20<sup>th</sup> May 9am – 8pm**

The Plan has been built from all the input  
villagers have given over the past year.

Visual displays will bring the Plan to life  
for you and you can read the full plan at  
[www.lingwoodburlingham.com](http://www.lingwoodburlingham.com)



*The past is in your head. The future is in your hands. Shape where you live.*



**Read about the detail of the Neighbourhood Plan within policies that cover:**

POLICY 1: **HOUSING MIX**

POLICY 2: **AFFORDABLE HOUSING**

POLICY 3: **TRAVELLER SITES** AND CAMPSITES

POLICY 4: **DESIGN** (*housing, gardens and drives*)

POLICY 5: RESIDENTIAL **PARKING** STANDARDS

POLICY 6: **DARK SKIES**

POLICY 7: **BIODIVERSITY AND GREEN CORRIDORS**

POLICY 8: LOCAL **GREEN SPACE**

POLICY 9: PROTECTION OF IMPORTANT **LOCAL VIEWS**

POLICY 10: SURFACE WATER FLOOD RISK

POLICY 11: **ECONOMIC DEVELOPMENT**

POLICY 12: IMPROVING **WALKING AND CYCLING ROUTES**

POLICY 13: **BURLINGHAM COUNTRY PARK**

POLICY 14: COMMUNITY PARKING PROVISION

Visual displays will bring the Plan to life for you and you can read the full plan at [www.lingwoodburlingham.com](http://www.lingwoodburlingham.com) and follow on Facebook [@lingwoodburlinghamplan](https://www.facebook.com/lingwoodburlinghamplan)

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**Saturday 13<sup>th</sup> and 20<sup>th</sup> May 9am – 8pm**

\*This Parish Neighbourhood Plan cannot override the Greater Norwich Local Plan (GNLP) but does document community views on development planning principles that will need to be taken account of. The Plan is our documented guidance to others. The Plan will last up to 40 years from the date a) it is approved via a future village referendum (this summer) and b) adopted by Broadland District Council.