

Ref.	Name	Organisation	Section	Support	Oppose	Supp w. mods	Comments	Reasons
TSANP-01	Planning Administration Team	Sport England	Whole Plan	-	-	-	Yes	The following is a summary; It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.
TSANP-02	Mr Ian Robinson	RSPB	Policy 4	-	-	Yes	-	Comment is made in Policy 4, page 22 regarding development and how: 'consideration will be given to insects and vermin.' The terms insect and vermin are very general and also the word vermin is very outdated. Could it be made clear what the emphasis is, be it - refusal based on design which might lead to increased numbers of pest invertebrates and/or mammalian pests such as mice or rats, or - during construction steps must be taken to prevent infestation from undesirable pest insects and mammals
TSANP-03	Alice Lawman	National Highways	Whole Plan	-	-	-	Yes	No Comment
TSANP-04	Louise Feavours	Marine Management Organisation	Whole Plan	-	-	-	Yes	No Comment
TSANP-05	Mrs Eleanor Laming	Resident	Whole Plan	-	-	Yes	-	The following is a summary: I support and commend those involved in producing this document. However, I feel that it is missing a fundamental key objective related to climate change; working towards building in resilience to withstand changes in climate which are predicted and accelerating at pace. It is noted that given the advanced stage of the plan, this may be something that is considered in more detail when the Plan is next updated. For example, more focus on walking and cycling as opposed to car parking (policy 3).
TSANP-06	Andy Scales	NPS on behalf of Norfolk Constabulary	Page 35 - CIL Issue	-	-	-	Yes	Please see representation for full comments. The Neighbourhood Plan refers to Community Infrastructure Levy. It still has the opportunity to include a specific policy regarding the use by the Town Council of developer contributions and CIL monies (or any subsequent replacement provision) to deliver local initiatives that create safer communities (and reduce crime). Such a policy could include measures identified by Norfolk Constabulary, along with the County and District Councils initiatives, to contribute to the finance of police infrastructure (including vehicles, operational equipment and communication equipment). Use of CIL monies by the Town Councils could, for example, be appropriate to finance local initiatives which create and maintain a safer community and quality of life. I trust that this concern can be incorporated into the Plan provisions to limit opportunities for crime and disorder and to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.
TSANP-07	Andy Scales	NPS on behalf of Norfolk Constabulary	Objective 5	-	-	-	Yes	Please see representation for full comments. It is noted that the Neighbourhood Plan retains the following Vision for the Neighbourhood Plan area 'in 2038, Thorpe St Andrew will be a socially and economically thriving community, which has retained its individuality, culture and identity'. It is considered that a key component to a socially thriving community is to ensure that crime and disorder does not undermine the quality of life and community cohesion. Therefore, inclusion of this consideration is important and would be consistent with Central Government advice. It is however disappointing that the Neighbourhood Plan still fails to include the specific objective to 'create and maintain a safer community and reduce crime and disorder' or include this within objective 5 (e) (which focusses on health and community considerations). This is important in creating a safe place and would ensure the Plan conforms with the NPPF advice outlined above in paragraph 92. I trust that this concern can be incorporated into the Plan objectives (and provisions) to limit opportunities for crime and disorder and to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.
TSANP-08	Andy Scales	NPS on behalf of Norfolk Constabulary	Policy 2	Yes	-	-	-	Please see representation for full comments. It is welcomed that Policy 2 (Creating a Strong Sense of Place) of the Neighbourhood Plan now includes specific reference to conforming to the principles of Secured by Design to help create safe spaces and neighbourhoods.
TSANP-09	Andy Scales	NPS on behalf of Norfolk Constabulary	Vision	Yes	-	-	-	Please see representation for full comments. It is noted that the Neighbourhood Plan retains the following Vision for the Neighbourhood Plan area 'in 2038, Thorpe St Andrew will be a socially and economically thriving community, which has retained its individuality, culture and identity'. It is considered that a key component to a socially thriving community is to ensure that crime and disorder does not undermine the quality of life and community cohesion. Therefore, inclusion of this consideration is important and would be consistent with Central Government advice.
TSANP-10	Stephanie Fletcher	Designing out crime officer, Norfolk Constabulary	General community safety	Yes	-	-	-	Happy with the consultation response from Broadland to amend the Plan to include changes with regards to comments on community safety

TSANP-11	Dr Will Fletcher	Historic England	Whole Plan	-	-	-	Yes	<p>Please see representation for full comments.</p> <p>Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle but, owing to staff vacancies, we do not currently have capacity to provide detailed comments.</p> <p>We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.</p>
TSANP-12	Ian Robinson	RSPB	Policy 1	-	-	-	Yes	<p>Policy 1 although correct might benefit from additional comment, such as 'habitats (e.g., woodland) are able to mitigate for climate change and provide a cooling mechanism alongside a space for wildlife. In the case of riparian habitats they provide a natural link between the town and the National Park.</p> <p>These comments apply equally to Appendix B</p>
TSANP-13	Place Shaping Team	Broadland District Council	General	-	-	-	Yes	<p>The Council notes that at several points in the document there appears to be some issues with the formatting of the PDF such as word spacing and gaps which will need to be rectified.</p> <p>The maps used throughout the Plan are missing details related to sources and need referencing.</p> <p>The Council considers that these issues need addressing in order to bring the clarity required by paragraph 16 of the NPPF.</p>
TSANP-14	Place Shaping Team	Broadland District Council	Para 1.7	-	-	-	Yes	<p>Factual Correction - Thorpe St Andrew is no longer the administrative HQ of Broadland District Council since moving to the Broadland Business Park located in Postwick</p>
TSANP-15	Place Shaping Team	Broadland District Council	Para 1.8	-	-	-	Yes	<p>A number of the bullet points are not grammatically correct in terms of following on from the introductory sentence i.e., should read 'Ensure the protection of ...', 'Improve sustainable transport ...'. It is also not clear what the fifth bullet point means, and it would be helpful if this could be elaborated in order to bring the clarity required by the NPPF.</p>
TSANP-16	Place Shaping Team	Broadland District Council	Par 3.6	-	-	-	Yes	<p>This paragraph would benefit from being updated to refer to the Greater Norwich Physical Activity and Sports Strategy.</p>
TSANP-17	Place Shaping Team	Broadland District Council	Para 3.7	-	-	-	Yes	<p>Factual Correction - This paragraph needs to be updated as Lloyds Pharmacy and the Town Council offices are no longer situated here.</p>
TSANP-18	Place Shaping Team	Broadland District Council	Para 3.10	-	-	-	Yes	<p>Factual Correction - Whilst St Andrews Park is within TSA (and includes Bannatynes), a significant proportion of Broadland Business Park (including Start-Rite, Premier Inn, Menzies Distribution, Costa Coffee, the former Bertram Books and the Horizon Centre are all in Postwick with Witton parish, outside the NP area</p>
TSANP-19	Place Shaping Team	Broadland District Council	Policy 1	-	-	Yes	-	<p>The following is a summary. Please see representation for full comments.</p> <p>The Council is concerned regarding a conflict with some of the proposed LGS designations in relation to some extant planning permissions and new outline planning permissions. In this regard, the Council notes that the National Planning Policy Framework sets out in respect of local green space that: "Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other services". It is also notable that, the planning practice guidance on Local Green Space (Paragraph 008 Reference ID: 37-008-20140306) states that a Local Green Space designation will rarely be appropriate where the land has planning permission for development. The Council is concerned that it has not been able to identify clear justification to demonstrate how and why the designation of proposed LGS 11 and 15, as currently set out, would be consistent with National Policy and Guidance in respect of Local Green Space and planning for sustainable development. Paragraph 31 of the NPPF sets out that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence that is focused on supporting and justifying the policies concerned, and take into account relevant market signals. In the absence of further clear justification, which has considered the impact of the designation on existing planning permissions, proposed development and the local planning of sustainable development and justifies the extent of the boundaries, the Council is concerned that the current LGS boundaries are not justified and will need to be revised in order for the Plan to be consistent with the NPPF and meet the requirements of the basic conditions. Such revised boundaries will need to omit areas that are subject to development within extant planning applications and any areas that could reasonably be expected to accommodate sustainable development based on an objective review.</p>
TSANP-20	Place Shaping Team	Broadland District Council	Para 7.8	-	-	-	Yes	<p>The last sentence of this paragraph doesn't quite make sense and would benefit from a rewrite in order to bring the clarity required by the NPPF.</p>
TSANP-21	Place Shaping Team	Broadland District Council	Policy 2	-	-	Yes	-	<p>The Council is not clear which part of the 'area to the east of the settlement' reflects the transition from urban to rural? The Broadland Northway/NDR provides a relatively hard edge to 'urban' Norwich, which is already further east than the Parish boundary. Existing and/or permitted development goes up to the eastern boundary of the parish and includes estate-scale housing and business park uses, which are primarily urban in form. The southern part of the parish does reflect a transition to the Broads, but this is covered elsewhere in the policy. This needs further clarification as it is not clear how a decision maker would interpret this.</p> <p>With regards Criteria f, whilst acknowledging that this is trying to reinforce the character of the area, it is felt that this could be strengthened by stating that any boundary treatments are also in keeping with the existing street-scene.</p> <p>Criteria g looks to minimise visual impact. This can be read as being positive or negative. Therefore, in order to improve clarity, the Council suggests 'while minimising visual harm' would be a better phrase.</p> <p>Whilst taking the two points above into account, criteria a) to j) are laudable, but it is not clear how some of these are locally distinctive to Thorpe St Andrew. As such, it is not clear how this Policy is adding to other national and local planning policies.</p> <p>The Council considers that these amendments are required in order to ensure that the Plan is clearly written and unambiguous and that it avoids unnecessary duplication of policies, in accordance with the NPPF (para. 16 d) and f)).</p>

TSANP-22	Place Shaping Team	Broadland District Council	Policy 3	-	-	Yes	-	<p>The following is a summary. Please see representation for full comments.</p> <p>The justification for such significant off-street parking seems to be linked to key routes that are impacted by on-street parking. The problems appear to be on key routes/locations, whilst other locations with better access to services/facilities/public transport etc. don't need such high levels of parking. The minimum number of spaces are high and in excess of the Norfolk County Council parking standards.</p> <p>As currently worded, the provision for on plot parking is also likely to result in significant issues with densities as it can lead to wasteful space and inefficient use of land.</p> <p>The Council considers that, in order to meet the NPPF requirement of contributing to the achievement of sustainable development (para. 16 a)), the policy needs a degree of flexibility to reflect the circumstances of each application, with an emphasis on well-designed parking to encourage better usage, rather than a blanket increase in overall provision.</p>
TSANP-23	Place Shaping Team	Broadland District Council	Policy 4	-	-	Yes	-	<p>The Council considers that bullet point 1) b) relates to design and appearance rather than protecting amenity. There is also a conflict with Policy 2(f) and the use of boundary treatments, and with Policy 3 which encourages on plot parking.</p> <p>Bullet point 2) a) to k) has significant overlap with existing national and local planning policy, and with other regulatory regimes and (despite the statement within para 10.2) the Policy does not appear to add anything locally distinctive to the existing Development Plan. Within the justification for this policy (para 10.2), it is not entirely clear why an amenity policy is referencing the 'character' of Thorpe St Andrew. It seems to be confusing the impact of building height, density, massing etc., in terms of design, with their impact on amenity.</p> <p>The introductory sentence in part 2 of the policy states that consideration should be given to the list of points that follow. The Council considers that this element could be strengthened by being re-worded to state 'It should be demonstrated that there is no unacceptable impact in terms of: ...'</p> <p>It is also suggested that paragraph 10.4 is amended to refer more directly to the requirements in part 2 of the policy, explaining that the provision of such a supporting document with relevant applications should be the mechanism through which consideration of these requirements is demonstrated.</p> <p>Para 10.5 – this appears to duplicate the preceding paragraph. If it is intended to say something different, then this should be clarified.</p> <p>The Council considers that these amendments are required in order to ensure that the Plan is clearly written and unambiguous and that it avoids unnecessary duplication of policies, in accordance with the NPPF (para. 16 d) and f)).</p>
TSANP-24	Place Shaping Team	Broadland District Council	Policy 6	-	-	Yes	-	<p>It is not clear from this policy how it would be determined that an existing employment area does not 'remain viable' (first sentence). It would not be reasonable if the loss of units was resisted indefinitely, and the policy is therefore not effective without any mechanism for assessing applications which result in the loss of the identified employment/commercial premises. This issue needs to be addressed in order to meet the NPPF requirement of contributing to the achievement of sustainable development (para. 16 a)). The Broadland Development Management DPD Policy E2 looks at the Retention of employment sites and Para 5.18 details a mechanism for demonstrating viability which could be useful in this regard.</p> <p>Whilst specific shops are named in the text, there is no annotation on the accompanying maps. The maps would benefit from clearer scales and annotations. They also need sources/references cited.</p> <p>Para 12.1 – the last sentence doesn't quite make sense; should this say that 'Other than the named sites, business areas are scattered ...'?</p> <p>The Council considers that these issues need addressing in order to meet the clarity required by the NPPF.</p>
TSANP-25	Place Shaping Team	Broadland District Council	Policy 8	-	-	Yes	-	<p>The Council considers that the wording of this policy is too weak and inconsistent in relation to existing national and local policy. This is particularly the case regarding paragraphs 199-203 of the NPPF and the tests in relation to less than substantial harm to a designated asset. The policy doesn't allow for the consideration of the public benefits of a scheme, including finding its optimal viable use.</p> <p>The use of the word 'harm' within the policy also needs to be used with caution as there are clear definitions as regards harm to heritage assets within the aforementioned sections of the NPPF.</p> <p>In addition, it is not clear why it is only development within the curtilage of the listed building, and not also development which affects the listed building itself, which is covered by the policy.</p> <p>The policy states that a list of non-designated heritage assets is included at Appendix C. However, para 13.5 and Appendix C state that the list is indicative. It is not appropriate for the list of non-designated heritage assets to be indicative as this creates a number of issues, including giving the decision maker no indication of why those assets listed are important and what it is about them that the policy is seeking to protect. This creates doubt about when the policy applies i.e., if an asset is on the list, when is the judgement made that it is actually a non-designated asset to which the policy applies? Also, by implication, are there other assets not currently on the list, which could be equally justified for inclusion as those listed? As such the policy is not suitably justified and further clarity is required in order to meet the requirements of NPPF paragraph 16.</p> <p>In terms of bullet point 2), the Council considers that encompassing the setting of the asset is extending the policy remit too far. If a site is not part of a conservation area, or part of the setting of a heritage asset, then the more general design policies of the Development Plan should apply.</p> <p>Regarding bullet point 3) it not clear that an application within a conservation area or the setting of an asset can actually be required to undertake repairs to the asset itself, as the two may not be linked.</p> <p>In terms of bullet point 4), it is felt that this again is only going to be appropriate in some specific circumstances.</p> <p>Again, the Council considers that these issues should be addressed in order to ensure that the Plan contributes to the achievement of sustainable development and brings the clarity and precision required by the NPPF.</p>
TSANP-26	Sue Allison	Resident	Policy 5	-	-	Yes	-	<p>11.1 - the intention reads as if will inform the criteria for residential moorings. However, we know that opposite River Green, on Thorpe Island, there has been residential mooring without permission and which does not meet the criteria set out in your statement e.g. (3). There is no suitable waste disposal on site and (5) there is no adequate designated parking to fit the formula shown for calculating spaces.</p> <p>The intention needs to state how it will be enforced to fulfil the criteria.</p> <p>11.2 & 11.3 - The River Green statement needs greater clarification in the Neighbourhood Plan as to how the area will be protected to maintain its characteristics. River Green is designated as open space within Policy TSA5 within the Broads Local Plan 2019. To protect the pleasant visual environment and to avoid a waterscape dominated by moored boats there needs to be inclusion in the Plan of retention of the 24 hour restriction on mooring on the River Green side of The Yare. People come to enjoy the green space and view of the river, its wildlife and activities and this enjoyment needs written protection within the plan of the 24 hour mooring restriction for all craft.</p>
TSANP-27	Sue Allison	Resident	Policy 6	-	-	Yes	-	<p>Promoting and enhancing economic development - This needs to contain a statement to show that prime consideration will given to residents within the development area eg increased noise should be a consideration and not be detrimental to the quality of life for residents in the area.</p>
TSANP-28	Sue Allison	Resident	Policy 7	-	-	Yes	-	<p>12.9 Needs to indicate HOW doctors and dentists will be encouraged to the area to service the residential expansion.</p>
TSANP-29	Sue Allison	Resident	Thorpe St Andrew NDP Project - Improve Car Parking	-	-	Yes	-	<p>It is acknowledged that the parking in River Green area suffers from a chronic shortage of places. The plan needs to acknowledge that this problem needs to be resolved before further permissions are granted for developments in the area. Bishy Boats is a lovely addition to the area but has increased further visitors with cars who have added to the difficulties for residents in the area. The illegal residential mooring on River Island further increased the congestion as most boat owners have cars parked on Yarmouth Road as the mooring doesn't fulfil the criteria laid down for residential dwelling on boats.</p>
TSANP-30	Sally Wintle	Natural England	Whole Plan	-	-	-	Yes	<p>Please see representation for full comments.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>
TSANP-31	Ella Thorpe	Broads Drainage Board	Whole Plan	-	-	-	Yes	<p>The following is a summary. Please see representation for full comments.</p> <p>We note that this Neighbourhood Plan is not making any specific allocations, however, in order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where any future developments are proposed within or partially within the Board's IDD, please be aware of the considerations laid out in the representation.</p>
TSANP-32	Norman Green	Resident	parking	-	-	-	Yes	<p>There seems to be little or no mention of a firm plan for provision of parking (one space per each berth) for the boats moored on the Island. There is no designated parking currently for the boat residents. As there are no parking restrictions currently in South Avenue the result is many cars and vans parked - most long term, in what is a narrow road. This has resulted in constant use of pavement driving for the large delivery vans and lorries that regularly use the road. The entrance to South Avenue is a mess of worn grass and is a sadly scruffy area in what used to be an attractive part of the town.</p>

TSANP-33	Suzi Heybourne	Resident	Policy 1/2/4/5/7	-	-	-	Yes	Fully in support of residential moorings however:- Not being sure of residential mooring regulations it is difficult to comment but would want to see enforcement of adherence to compliance with disposing of waste materials. The residential mooring at River Green can look chaotic and unmanaged - often three deep. Buildings are dilapidated. Can this area be improved whilst still protecting the needs of people living on boats at River Green.?
TSANP-34	Suzi Heybourne	Resident	Policy 3/6/Project improve car parking	-	-	-	Yes	We require a reliable bus service to ensure people can commute to Norwich City Centre for work, considering those that work shifts. Evening bus service to ensure people particularly young people can access and return from City centre to ensure well being and connectivity. Insufficient car parking for restaurants, church and amenities on Yarmouth Road. Overspill onto adjoining roads that block entrances to houses. Concern for many vans that people sleep in on residential streets and Yarmouth road. Sometimes left for days.
TSANP-35	Kirsten Ward	DLP Planning Limited	Policy 1	-	Yes	-	-	Please see representation for full comments. Our client is a Director of C A Trott (Plant Hire) Limited, who are the registered landowners of land at Weston Wood, at the western end of Western Avenue. This area of Weston Wood is currently identified in Policy 1 of the Thorpe St Andrew Neighbourhood Plan as a proposed Local Green Space. This designation is shown as no.16 on the Policy 1 map on page 17 of the Neighbourhood Plan. Our client strongly objects to the designation of Weston Wood as a Local Green Space for the reasons outlined below. Whilst it is acknowledged in Planning Practice Guidance that Local Green Spaces do not need to be publicly accessible in order to be designated as such (paragraph 017, ref. 37-017-20140306), it is unclear how the Town Council has reached their assessment conclusion that the Weston Wood site has 'communal value' as it is in private ownership and there is no public access into or through the site. There is a public right of way which runs along the eastern site boundary as an extension of Western Avenue, however this does not pass through the Weston Wood Local Green Space site itself. The representation states that the Weston Wood Local Green Space designation is not considered to comply with NPPF paragraph 102, criterion (b) or criterion (c). The current proposed Local Green Space designation is considered to be contrary to Planning Practice Guidance. The fact that consultation did not occur represents poor plan-making practice and is directly contrary to Planning Practice Guidance. In conclusion, as the Neighbourhood Plan does not comply with the NPPF (paragraph 102) and Planning Practice Guidance (related to Local Green Space designations and neighbourhood plan consultation) it has therefore failed to meet the first Basic Condition as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.
TSANP-36	Natalie Beal	Broads Authority	Policy 1	-	Yes	-	-	Policy 1 says 'Development should minimise the disruption of habitats and seek to conserve and enhance existing environmentally important...'. The underlined wording seems quite weak and at odds with the stance in the NPPF and Strategic Policy SP6 of the Local Plan for the Broads, which are as follows: The NPPF states at Paragraph 8c (and in other areas): '... to protect and enhance our natural built and historic environment'; Policy SP6 states: 'Biodiversity Development will protect the value and integrity of nature conservation interest and objectives of European, international, national and local nature conservation designations and should demonstrate biodiversity gains wherever possible paying attention to habitats and species including ecological networks and habitat corridors, especially linking fragmented habitats of high wildlife value'. It is clear that the wording underlined in SP6 and the NPPF are stronger. Policy 1 therefore needs to be changed to be consistent with SP6 and the NPPF and the words such as 'should minimise' and 'seek to' which make the Neighbourhood Plan's stance weaker than national and local plan policy, need to be removed.
TSANP-37	Natalie Beal	Broads Authority	Policy 8	-	Yes	-	-	Policy 8 says 'New development proposed within the Conservation Area, or within the curtilage of a listed building, scheduled monument, or non-designated asset (full list in Appendix C) <u>should</u> minimise the impact on these assets by...'. The underlined part is weaker in its wording than SP5 of the Local Plan for the Broads which says, amongst other things: 'The historic environment of the Broads will be protected and enhanced. Key buildings, structures and features which contribute to the Broads' character and distinctiveness will be protected from inappropriate development or change'. This policy, as proposed, is also contrary to the NPPF which states at Paragraph 189: 'These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. Policy 8 therefore needs to be changed to be consistent with SP5 and the NPPF and the words such as 'should minimise' which make the Neighbourhood Plan's stance weaker than national and local plan policy, need to be removed.
TSANP-38	Natalie Beal	Broads Authority	Policy 2	-	-	-	Yes	Policy 2 states under e) use contextually appropriate high quality materials including sustainable and traditional materials and f) use a range of boundary treatments including walling, hedging and new tree planting. Should that go further and state that the preference will be for sustainable materials / walling, hedging etc? Also policy 2 – there are a few typos with spaces missed (e.g. second para 'importantlandscape'; point 2 'thesettlement' etc.)
TSANP-39	Natalie Beal	Broads Authority	Policy 3	-	-	-	Yes	'encourages' the various policy things. This is a change in wording from the REG14 version. I raised queries at Regulation 14 stage on the use of encourage in policy 2. Queries are the same for this policy – because the policy as written only encourages, it does not require it and therefore it is not a given that these things will actually happen on a development. Wording on policy 3 on cycle and walking access needs to be stronger - a lot of use of "should" – this is a suburb close to an urban centre. Policy 3 makes no mention of ensuring adequate storage for bicycles – there should be at least as many spaces for securely storing bicycles as cars.
TSANP-40	Natalie Beal	Broads Authority	Policy 5	-	-	-	Yes	For residential moorings requiring a boat of 2 berths to have 2 cars – is this excessive?
TSANP-41	Natalie Beal	Broads Authority	Policy 7	-	-	-	Yes	Just to raise again, like I did at Regulation 14, that the three criteria are different to our policy DM44. Our original DM44 looked like Policy 7, but the Inspector said it was too permissive and told us to amend it. Just something to consider.
TSANP-42	Natalie Beal	Broads Authority	Appendix C	-	-	-	Yes	'Broadland District Council Offices' are referred to. As they no longer occupy the building just refer to it as Thorpe Lodge? no. 30 Pound Land instead of Pound Lane

TSANP-43	Natalie Beal	Broads Authority	Factual Corrections	-	-	-	Yes	<p>Para 1.4 – says ‘the emerging local plan’ – which local plan is that? We raised this before and the consultation statement said this would be clarified.</p> <p>Factual. Policy 1 and map page 17. Thorpe Island (number 4) is not allocated as open space in the Local Plan for the Broads. The open space policies maps are here: DM7_OPEN_SPACES.pdf (broads-authority.gov.uk). Thorpe Island has its own policy, yes.</p> <p>Map page 17 – number 5 is a protected space in the Local Plan for the Broads by virtue of its own policy. Just checking you also want it to be a local green space as well as being protected by policy TSA1 in the Local Plan for the Broads... Local Green Space is treated like Green Belt in the NPPF, whereas TSA1 is its own policy.</p> <p>Typographical errors Para 3.10 – second part of para does not really make sense... ‘The Business Park is home to a mix of business and commercial uses including some retail and prominent firms located here include Bannatynes Health Club and Spa, Startrite shoes, Yodel, Bertram Book, Premier Inn, Menzies Distribution, Royal Bank of Scotland, Costa Coffee and the Horizon Business centre’. Maybe rather than saying ‘include’, say ‘including’ or ‘such as’? 7.7 says ‘The policy seeks to recognising these areas’ – should it be recognise? Para 11.2 – typo – last few words: ‘walk to three of more key services’. Should say ‘or’.</p> <p>Formatting Para 1.2 – extra full stop</p> <p>There are lots of words that need a space between them. A few examples are here, but on producing the final version, a check is required. Para 1.1 – space needed between ‘planningpolicies’ Para 1.5 – space needed between ‘arereferred’ Para 1.8 – last bullet, space needed between ‘theriver’ Para 3.3 – space needed between ‘hasbeen’ Vision – space needed between ‘cultureand’</p>
TSANP-44	Daniella Marrocco	Berliet Limited c/o Stantec UK Limited	Policy 1	-	-	-	Yes	<p>This is a summary. Please see full representation.</p> <p>Berliet Limited have pursued the residential development of 4 sites (Griffen Lane, Pinebanks, Langley North, Langley South) within Thorpe St Andrew. The boundaries of proposed Local Green Spaces of Weston Pits (11) and Thorpe Ridge (15) fall within the Pinebanks, Langley North and Langley South sites. The proposed Weston Pits (11) designation includes a site of geological importance and does not include ancient woodland. As this is an already established County Geodiversity Site, no part of the application proposals for Pinebanks include development in this location. The area will be reserved for public recreation and new paths and steps will link this area with the Pinebanks development site. Therefore, we support the designation of Weston Pits (11) as a Local Green Space in principle. The proposed Thorpe Ridge (15) designation covers a large expanse of woodland, including ancient woodland, within the Pinebanks, Langley North and Langley South sites. A Woodland Management Plan for the woodland areas included within the Pinebanks, Langley North and Langley South sites has been approved as part of the Pinebanks permission (ref. 20130649), and a revised and updated Woodland Management Plan forms part of the live applications across all four sites. In its existing state, the ancient woodland is in poor condition, mainly due to the spread of invasive species. The Woodland Management Plan seeks to manage the woodland over a 20-year period to restore and preserve the integrity of the ancient woodland, reduce the number of non-native species, increase biodiversity and enhance facilities for public recreation within less sensitive parts of the woodland (i.e. areas of non-ancient woodland).</p> <p>Ancient woodland is defined as an irreplaceable habitat and is protected from development resulting in its loss and deterioration within National Planning Policy Framework (NPPF) paragraph 180(d). Creating public access to the ancient woodland, as intended through the proposed Local Green Space, will cause deterioration of the woodland and contradicts the protection provided within paragraph 180(d) of the NPPF. Therefore, the designation of Thorpe Ridge (15) as Local Green Space is not supported due to the national protection afforded to ancient woodland and the risk of the deterioration of its integrity and important habitats which would occur by enabling public access.</p>
TSANP-45	Miss T Dye & Mr M Zschorn	Resident	Parking	-	-	-	yes	<p>The following is a summary. Please see the full representation.</p> <p>The main concern is that any development is going to mean , more people in the area, more cars which inevitably means more parking in South Avenue .</p> <p>South Avenue is already the overspill for the Rushcutters, Chapel Lane, Boat residents, local businesses and visitors to the Green. South Avenue is narrow in some parts making access to driveways difficult especially when people park opposite driveways. I know lots of the residents feel the same about the parking with access and visibility being restricted by parked cars.</p> <p>I dont know if there has been any further consideration given to the Land off Yarmouth Rd being designated as car parking for River Green, Thorpe St Andrew Parish Church and local businesses. We would welcome anything that would relieve congestion</p>
TSANP-46	Graham Allison	Resident	Whole Plan	-	-	-	Yes	<p>Basic Conditions Statement</p> <p>PAGE 18 Policy 3: Connectivity and enabling adequate car parking. This policy encourages the provision of new pedestrian and cycle connections and provides criteria for the design and provision of car parking in new developments.</p> <p>COMMENT: Where is there any mention of parking for existing areas. River Green area has insufficient parking provision for the expansion of amenities that has taken place and it is impacting on safety and enjoyment for the existing residential properties because of the large volumes of visitor parking. The use of the old highways depot behind the Rushcutters is an important element which needs prompt action. There needs to be yellow lines in South Avenue which are enforced.</p> <p>Page 18 Policy 5: Residential Mooring. This policy provides for new residential moorings in appropriate locations subject to criteria controlling impacts on the natural and historic environment and residential amenity.</p> <p>COMMENT River Green has a large area of unsightly residential moorings on the Island. On the River Green bank we now have boat and canoe hire and 24 hour free mooring and picnic areas which means major impact on local residents. It is a busy road which requires speed restrictions to be enforced and some permanent parking area, not nearby local roads or main road.</p> <p>PAGE 19 Policy 5: Protecting the Historic Environment. This policy seeks to protect the historic environment of the parish.</p> <p>COMMENT The heritage in the River Green are is historic and consideration of suitable means of protecting it for future generations is vital.</p>

TSANP-47	Carol Ferris	Resident	Policy 2	-	-	-	Yes	<p>"Respondents also stated that new developments should have design features which minimise the impact on the environment, including trees, solar panels, electric charging points and off-street parking." This statement is not a commitment by the council. The plan should indicate that new developments would be required to include solar panels and electric vehicle charging points. If the sale of diesel/petrol cars is to cease from 2030 the plan needs to reflect this.</p> <p>We would like to see the builders of new developments considering installing ground or air source heat pumps instead of gas boilers.</p> <p>The plan is mainly concerned with maintaining the identity of Thorpe St Andrew and building in a certain style, but fails to address the future housing needs of the community.</p> <p>There is no mention of making a certain percentage of social and affordable housing available. No mention of shared ownership. TSA has a relatively low percentage of social housing, but many on the housing list.</p> <p>Opportunities for downsizing are lacking in TSA. More opportunities would mean senior adults could maintain their social lives and friendships whilst freeing up larger, existing properties for families.</p> <p>ty. This would particularly help those older people who live in larger properties than they need, but who are on low incomes.</p>
TSANP-48	Carol Ferris	Resident	Policy 3	-	-	-	Yes	<p>Connectivity and considering adequate car parking.</p> <p>We agree there needs to be excellent cycle and pedestrian routes. Many residents have made the case that on-street parking is problematic. This plan does not address how to change and manage the existing problem but only looks at new developments.</p> <p>Thorpe St Andrew North West, designed when households had one or no cars, so is more affected by this issue than Thorpe South East, but Dussindale has considerable problems with parking. We would like to see the removal of verges on some roads, brick weave parking bays installed in high traffic areas and the consideration of double yellow lines along one side of let roads to encourage better traffic flow.</p> <p>Census data does NOT support the need for so many parking bays for new houses e.g, 4 for a 4 bedroom house. Much is written on improving parking rather than improving public transport</p>
TSANP-49	Carol Ferris	Resident	Policy 5	-	-	-	Yes	<p>The plan suggests what seems to be an excessive amount of parking/mooring place. If the area at the bottom of Thunder Lane were to be used as additional parking, the bridge would need to be maintained and repaired, as it would be used more often!</p>
TSANP-50	Carol Ferris	Resident	Policy 8	-	-	-	Yes	<p>Protecting the historic environment. We feel that the WW2 bunker, listed as a non-designated heritage interest should be protected as a Heritage Site.</p>
TSANP-51	Tessa Saunders	Anglian Water	Policy 1	-	-	Yes	-	<p>Policy 1 – Protecting and Enhancing the Natural Environment</p> <p>Anglian Water welcomes the objective of the policy to conserve and enhance the natural environment, which aligns with our purpose and strategic long term ambitions.</p> <p>We note that it is proposed to designate the Belmore Plantation as Local Green Space. Land designated as Local Green Spaces has the same status as Green Belt land and the associated policy requirements as stated in the National Planning Policy Framework. This potentially could place an unnecessary policy burden which could limit our ability to bring forward investment if required at these assets. For example, engineering operations e.g. laying of hardstanding are inappropriate development in the Green Belt unless it can be demonstrated that it does not conflict with the openness of the designated land.</p> <p>We would therefore ask that the sewer pumping stations at the edges of Belmore Plantation (to the north-west and south-east corners) are removed from the proposed local green space designation or that suitable policy wording would support such engineering operations to be undertaken to enhance the function and efficiency of our infrastructure, should this be required.</p>
TSANP-52	Tessa Saunders	Anglian Water	Policy 2	-	-	-	Yes	<p>Policy 2 - Creating a strong Sense of Place</p> <p>Anglian Water supports the intention of the policy to ensure sustainable and resilient developments as part of delivering high quality designs for the neighbourhood plan area.</p> <p>We would welcome appropriate examples to be referenced in criterion g. such as improving water and energy efficiency. As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/storm water harvesting and reuse, and greywater recycling. Such detailed water efficiency measures could be referenced in the supporting text.</p> <p>Anglian Water supports reference to sustainable drainage systems in criterion h. - we advocate the use of SuDS in following the drainage hierarchy. We would suggest that the wording could be improved to read: Use sustainable drainage systems to protect against pollution, provide drainage effective management of surface water run-off on site, and wider amenity, recreational and biodiversity benefits.</p>
TSANP-53	Tessa Saunders	Anglian Water	Policy 5	-	-	-	Yes	<p>Policy 5 - Residential Mooring</p> <p>Anglian Water supports the policy requirements for residential mooring, particularly with regard to suitable waste disposal facilities, which include suitable measures to ensure the disposal of wastewater from the moorings is managed effectively through the appropriate wastewater infrastructure.</p>
TSANP-54	Sarah Vergette	Broads Society	Whole Plan	-	-	-	Yes	<p>The Broads Society generally supports the overall vision, objectives and policies of the draft neighbourhood plan. With regard to specific policies, the Broads Society's comments are set out below.</p> <p>The Broads Society particularly supports Policy 1 of the draft plan aimed at protecting and enhancing the natural environment. The Society specifically welcomes the inclusion of the River Green, Cary's Meadow, Thorpe Island and Thorpe Marshes/St Andrew Broad within the 16 spaces specifically identified for protection under Policy 1.</p> <p>The Society generally supports Policy 3 of the Plan designed to ensure connectivity and the provision of adequate car parking. Linked to this is the aspirational project to provide more local car parking on the former Norfolk County Council Highways Depot site just to the east of the Rushcutters pub. This aspiration is fully endorsed by the Society as long as it is carried out in a sympathetic manner as this will provide local economic benefits to those businesses close to River Green by providing much needed additional parking for both locals and visitors.</p> <p>The Broads Society fully supports Policy 5 of the draft plan in respect of the provision of new residential moorings subject to the criteria set out in the policy being fully complied with..</p> <p>The Broads Society supports Policy 7 which aims to protect and create local community facilities including green spaces, aimed at improving health and the quality of life for local residents.</p> <p>The Broads Society supports Policy 8 of the Plan which seeks to protect the historic environment. The Society considers that the protection of the built heritage and assets of the Conservation area is important in retaining the historical context and the setting of the town which particularly contribute to the character of the immediate and wider Broads area. The enhancement and protection of nationally and locally significant buildings, including many of which are within, adjacent to or overlooking the Broads Executive area is to be welcomed</p>

TSANP-55	Joe Wyatt	Norfolk County Council - Minerals & Waste	Policy 1	-	-	-	Yes	<p>Please find below comment from Minerals and Waste:</p> <p>Norfolk County Council as the Minerals and Waste Planning Authority has no objections to the Thorpe St Andrew Town Council Neighbourhood Development Plan (Regulation 16 Submission Draft). However, it should be noted that the following local green spaces are 2 or more hectares and underlain by sand and gravel resource:</p> <ul style="list-style-type: none"> • Belmore Plantation • Brown's Plantation • Cary's Meadow • Sir George Morse Park • Fitzmaurice Park • Weston Pits • Thorpe Ridge • Weston Wood <p>Since the allocation is for local green space, it does not sterilise the mineral resource underlain. However, if a planning application was to be submitted for built development policy CS16 "safeguarding mineral and waste sites and mineral resources" (or any successor policy) of the Norfolk Minerals and Waste Local Plan would apply.</p> <p>The department also noted that there may be an error in a map under Appendix A (Thorpe St Andrew Character Statement). The map on page 43 shows three character areas, however, the written descriptions of the north and south character areas do not match the boundaries shown on the map. The description of the south area is that the layout is linear following the River Yare and is almost wholly within the Conservation Area, but the map shows the south area extending up to St William's Way which includes a large area of residential development from the 1930s and also from the 1980s which is not in the Conservation Area.</p>
TSANP-56	Liz Starling	Norfolk County Council - LLFA	Whole Plan	-	-	-	Yes	<p>Please Note: this representation was received after the consultation deadline</p> <p>The following is a summary. Please see the representation for full comments;</p> <p>The LLFA notes that the Thorpe St Andrew Town Council Neighbourhood Development Plan (Regulation 16 Submission Draft) and its proposed policies make limited references to flooding resulting from various sources such as surface water, fluvial flooding and groundwater. Of the 8 policies proposed, Policy 1: Protecting and Enhancing the Natural Environment and Policy 2: Creating a Strong Sense of Place, are of most relevance to matters for consideration by the LLFA.</p> <p>The LLFA welcomes that Proposed Policy 2: Creating a Sense of Place has now been enhanced from the version included within the Regulation 14 draft and refers within points g -l to the need for developments to give consideration to measures to help off-set or mitigate climate change, the use of Sustainable Drainage Systems (known as SuDS) to help protect against pollution which provide drainage and wider amenity, recreational and biodiversity benefits, along with developments avoiding the use of hard-standings with the use of porous surfaces encouraged to help manage surface water drainage.</p> <p>According to LLFA datasets (extending from 2011 to present day) we have 15 no. records of internal flooding and 29 records of external/anecdotal flooding in the Parish of Thorpe St Andrew. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.</p> <p>The LLFA is concerned at the lack of specific flood risk policies, references to internal drainage board or Environment Agency Flood Zones and would recommend that reference is made to national and local policies. It also recommends the inclusion of mapping to demonstrate this.</p> <p>The document now proposes 12 no. Local Green Spaces which are identified in Policy 1: Protecting and Enhancing the Natural Environment, the accompanying Policy Map, with site justification included in Appendix A. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment on LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan, other than the observations made in our Regulation 14 comments in respect of Thorpe Marshes/St Andrews Broad which appears to the LLFA to no longer proposed for allocation.</p>