

Ref.	Date	Organisation	Section	Support	Oppose	Supp w. mods	Comments	Reasons
LBNP01	21/09/2023	National Highways	General				✓	<p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly. National Highways wishes to draw the attention to the A47 upgrade between Blofield and North Burlingham. The upgrade to dual carriageway aims to ease congestion and support economic growth in the area. Any future allocations or developments within the parish should consider the impact of the scheme.</p> <p>Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
LBNP02	06/10/2023	Anglian Water	General				✓	I can confirm that we have no comments, and we are satisfied that Parish Council has addressed the matters we raised at the Reg. 14 consultation and amended the Submission Neighbourhood Plan accordingly.
LBNP03	10/10/2023	Broadland District Council	General			✓		The Council remains of the view that this is a very thorough and comprehensive draft Neighbourhood Plan. The comments raised by the Council at the Regulation 14 stage have been considered by the Steering Group and several changes have been made in order to address the majority of these issues, as suggested by the Council. The representations below highlight several areas where the Council still considers that changes are necessary in order for the Plan to meet the basic conditions.
LBNP04	10/10/2023	Broadland District Council	Policy 3: Traveller Sites and Campsites (page 22)			✓		<p>The Council made substantive comments on this policy at the Regulation 14 stage and, as a result, changes are evident in the Regulation 16 version of the plan. Changes include an emphasis in the supporting text to the fair and equal treatment of travellers and several criteria in the policy have been removed, the effect of which is that the policy is less likely to unfairly inhibit the permission for sites in the future.</p> <p>However, the Council does still consider that the Policy should be split in two. The provision of permanent residential accommodation for Gypsies and Travellers is a different subject from providing for tourism uses. Not all of the criteria of the policy would be applicable to both types of development but no distinction is made in the policy.</p> <p>The Council considers that addressing these points will ensure that the policy brings the clarity and precision required by paragraph 16 of the NPPF.</p>
LBNP05	10/10/2023	Broadland District Council	Policy 4: Design (page 30)			✓		<p>The Council commented during the Regulation 14 consultation stage that the reference to “low density” development should be removed. This has been addressed and therefore the potential conflict with paragraph 125 of the NPPF to “optimise the use of land” has been addressed.</p> <p>The Council also commented at the Regulation 14 stage that the policy is overly prescriptive and, despite some changes, this is still considered to be the case. Such a prescriptive approach brings with it the risk of conflict between the criteria in the policy. For example, whereas criteria ‘a’ to ‘e’ emphasise having regard to existing housing in the surrounding area, criterion ‘h’ could be interpreted as emphasising contemporary design that is able to meet climate change targets.</p> <p>The Council considers it necessary for there to be a change in wording to make it clear that it will not always be necessary for a development to meet all the criteria under Policy 4. This could be done by simply changing the introductory paragraph before the criteria by adding the phrase “where appropriate”, so that the sentence says: “The following design considerations are especially important to the area and should be applied, where appropriate.”</p> <p>The Council considers that this amendment is required in order to ensure that it is evident how a decision maker should react to development proposal and that the policy is able to contribute to sustainable development, as required by the basic conditions and the NPPF.</p>
LBNP06	10/10/2023	Broadland District Council	Policy 5: Residential Parking Standards (Page 32)			✓		<p>The courtyard parking policy for a maximum of 4 spaces was queried by the Council during the Regulation 14 consultation, but this has been retained by the Steering Group based on evidence prepared by AECOM.</p> <p>On reviewing the Design Guidance and Codes (page 55), it is clear that the intention is for parking courts to comprise of bays which should be arranged in clusters of up to 4 spaces each, interspersed with trees and soft landscaping. However, the wording of the final paragraph of Policy 5 does not clearly state this and could be misinterpreted as meaning that any courtyard parking should be for a maximum of four spaces.</p> <p>Norfolk County Council’s ‘Parking Guidelines for new development in Norfolk’ (July 2022) states that “shared parking courts should also be avoided wherever possible, as they’re rarely fully utilised resulting in significant levels of on-street parking.” The Council isn’t clear what evidence has been developed locally to result in policy wording that takes a more relaxed approach to the development of parking courts than Norfolk County Council’s guidelines. On this basis, the Council considers that an addition is required to this element of the policy wording, along the lines of “Where considered appropriate, in line with Norfolk County Council’s ‘Parking Guidelines for New Development in Norfolk (2022)’, parking bays must be...”, or similar.</p> <p>The Council considers that this amendment is required in order to ensure that the policy contributes to the achievement of sustainable development and to ensure that the policy is underpinned by relevant and up-to-date evidence that is adequate and proportionate (NPPF paras. 16a and 31).</p>

LBNP07	10/10/2023	Broadland District Council	Policy 10: Surface Water Flood Risk and Management (Page 59)			✓		<p>As stated during the Regulation 14 consultation stage, the Council is not clear how Policy 10 adds to policy and guidance at the national and local levels. Surface water flood maps (Figures 28 and 29) have been included in the supporting text to the policy, but the policy itself does not reference the maps or the locations within the village which are most liable to suffer surface water flooding. This would bring local detail to the policy which would distinguish it from those currently within the Development Plan. In addition, the policy content predominantly relates to sustainable drainage rather than wider issues related to surface water flood risk, as indicated by the policy title.</p> <p>Although, in other respects, Policy 10 is not in conflict with existing policy and guidance, the Council is not convinced that the policy serves a clear purpose or avoids unnecessary duplication, as required by the NPPF.</p>
LBNP08	10/10/2023	Broadland District Council	Policy 11: Economic Development (Page 62)			✓		<p>The Council understands that the purpose of the policy is to support planning applications that are positive for small businesses and community facilities, but the Council feels that the policy would benefit from increased precision, in accordance with paragraph 16(d) of the NPPF.</p> <p>As to the first bullet point of the policy, the Council considers that the term, ‘small business’ needs to be defined in this context, in order that decision makers know how the policy should be applied.</p> <p>As regards the second bullet point, the Council considers that it should be clarified that this statement relates to community facilities. If a wider range of services/facilities are being supported here, then these will require justification.</p> <p>In terms of the third bullet point, the Council would query the condition ‘where it is directly related to the existing business’. What is meant by the phrase ‘directly related to’? In many cases, new development or re-development of farm buildings through diversification, doesn’t directly relate to agriculture. The phrase needs to be clarified and there should be an explanation of how this element of the policy is consistent with NPPF paragraph 84(a), which deals with farm diversification, and therefore how it meets the basic conditions for neighbourhood planning. It is felt that the policy should also clarify that allowing development which maintains the viability of an existing business that may otherwise falter is considered a justified aim.</p> <p>The second paragraph states that proposals providing ‘an increase in local employment will be seen as delivering significant benefit’. This does not seem to link to any other qualifying criteria of this or any other policy. As such the Council is somewhat unclear on what this criteria is seeking to achieve within the context of the wider policy.</p> <p>The remainder of the policy appears to seek to give support to economic development or diversification or the provision of (what we believe is meant to be) community facilities in qualified circumstances. This sentence appears to seek to attribute a generic significant weight to all proposals that increase local employment, even if not consistent with other aspects of the policy. In order to ensure a decision maker is clear on how to react to development proposals, in line with Paragraph 16 of the NPPF, the Council considers that this element of the policy needs to be amended such that it is clear how it relates to other elements of the policy.</p> <p>The Council would also have concerns about attributing significant weight, even in circumstances where the actual increase in employment would be limited.</p>
LBNP09	10/10/2023	Broadland District Council	Community Action 3: CIL Money (Page 63)			✓		<p>Whilst not directly relevant to meeting the basic conditions, it is felt that other projects in the Neighbourhood Plan could be cross-referenced, such as investing CIL to fulfil the aim of providing a new scout hut or the aspiration for creating Burlingham Country Park</p>
LBNP10	10/10/2023	Broadland District Council	Appendix E (page 88)			✓		<p>Factual correction - The title of Appendix E should be amended to read ‘Broadland District Council Green Infrastructure Project Plan 2015 Maps (Source: Broadland District Council). Although this plan was developed by Norfolk County Council, it was commissioned by Broadland District Council and produced on behalf of the latter authority.</p>
LBNP11	10/10/2023	Natural England	General				✓	<p>The following is a summary - Natural England does not have any specific comments on the Lingwood & Burlingham Neighbourhood Plan.</p>
LBNP12	10/10/2023	Norfolk County Council - Historic Environment Team	General				✓	<p>Historic England’s published guidance on the preparation of Neighbourhood Plans (https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/) encourages the full consideration of heritage assets and suggests ways in which this can be achieved.</p> <p>Based on this guidance, we would like to suggest the authors of the plan follow a number of steps:</p> <ol style="list-style-type: none"> 1. Study Historic England’s published guidance and consider how the plan can take its advice on board. 2. Contact the Norfolk Historic Environment Record and request information on heritage assets within the plan area. The NHER can be contacted at heritage@norfolk.gov.uk. 3. Consider the full range of heritage assets within the plan area and identify those they feel are most significant. They may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration.

LBNP13	10/10/2023	Norfolk County Council - Lead Local Flood Authority	Policy 4 - Design; Policy 5 - Residential Parking Standards; Policy 10 - Surface Water Flood Risk & Management			✓		<p>The following is a summary - The LLFA welcomes the references retained in the Draft Neighbourhood Plan Regulation 16 Version and its proposed policies to flooding from various sources such as surface water and fluvial and the recognition that by considering flood risk early as part of all new development, it may be possible to avoid it, manage it more efficiently or in a way that adds value to biodiversity, the wider natural environment, as well as recognising the potential impacts of climate change on flooding and new development and upon the surrounding landscape.</p> <p>The LLFA would still recommend as mentioned in our previous Regulation 14 response that Policy 10 could be further enhanced by reference being made to the four pillars of SuDS within the policy text.</p> <p>The LLFA still recommends that a full review of flooding within the Parish should be carried out to assess all sources of flood risk in Lingwood and Burlingham, including flood risk from surface water, groundwater, rivers and ordinary watercourses, supported by relevant mapping for all sources and covering the whole Parish.</p> <p>According to LLFA datasets (extending from 2011 to present day) we have 5 no. records of internal flooding and 5 no. records of external/anecdotal flooding in the Parish of Lingwood and Burlingham. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.</p> <p>We are not aware of AW DG5 records within the Parish of Lingwood and Burlingham, however, this will need to be confirmed with/by Anglian Water.</p> <p>According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Lingwood and Burlingham.</p> <p>The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area.</p>
LBNP14	10/10/2023	Norfolk Wildlife Trust	Natural Environment (page 34, s78)				✓	<p>Just a technical note: There are two County Wildlife Sites (CWS) within the NDP area and one adjacent. (not three as advised on page 34, S78).</p> <ol style="list-style-type: none"> 1. Belt Plantation 2. Church & Drive Plantation <p>Buckenham Wood: This is adjacent to the NDP area.</p>
LBNP15	10/10/2023	Norfolk Wildlife Trust	Policy 6: Dark Skies (page 39)			✓		<p>We support the wording in Policy 6: Dark Skies but recommend adding to the 2nd paragraph of the policy, 'Such proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats (https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/)'</p> <p>We particularly support the wording, 'Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'</p> <p>It is imperative for the protection of wildlife that each of these: wildlife roosts, foraging habitat and commuting routes are protected from artificial lighting. Specific reasons for this are given in the best practice guidance as indicated above. Light pollution has an overall negative impact on wildlife and species are affected in many different and numerous ways.</p>
LBNP16	10/10/2023	Norfolk Wildlife Trust	Policy 7: Biodiversity and Green Corridors (7c)			✓		<p>We are pleased to see that there is a strong focus from the local community on the protection of wildlife and important habitats. With 2 County Wildlife Sites, Priority Habitats and other green infrastructure within the Neighbourhood Plan area, Policy 7 will be important in providing protection and enhancement of such areas. We welcome the provision of the green corridors identified in figure 22, to link habitats and reduce fragmentation and support the policy wording of 'Policy 7: Biodiversity and Green Corridors'.</p> <p>7c) The wording 'to reduce the loss' is duplicated in 7c.</p> <p>We suggest additional wording to the last sentence of 7c to also include the planting of trees and the addition of green roofs for community buildings where appropriate. We also recommend using the words 'mitigate the loss' rather than 'to reduce the loss' for consistency with national guidance and terminology.</p>

LBNP17	10/10/2023	Norfolk Wildlife Trust	Policy 8: Local Green Space			✓		<p>We support Policy 8: Local Green Space and the 8 areas designated as Local Green Spaces.</p> <p>It could be beneficial to have an additional map showing the Local Green Spaces, Green Corridors, County Wildlife Sites (CWS), Priority Habitats and all other Green Infrastructure together on one map. Both Figure 22 (Green Corridors), Figure 23 (Local Green Spaces) and the policies maps on pages 73 and 74 are useful as separate maps. However, an additional, comprehensive map, as outlined above, would make it easier to assess where green infrastructure can be best targeted and enhanced in the future.</p> <p>We recommend additional policy wording proposing 'All new development to include, wherever possible, on site new green space to help reduce additional visitor pressure on nearby County Wildlife Sites'.</p> <p>Both County Wildlife Sites (CWS) within the Neighbourhood Plan area were reported as being in an 'unfavourable declining condition' when they were last surveyed in 2021. The causes of this habitat degradation on 'Belt Plantation CWS' was nutrient enrichment, attributed to dog fouling and agricultural run-off. The general issue of dog fouling has undergone some research and it is now recognised that it can lead to increases in nutrient loads, leading to loss of biodiversity and in turn habitat degradation. There was also an issue with nutrient enrichment on 'Church & Drive Plantation CWS' although the causes were less clear.</p> <p>Buckenham Woods, immediately south of the Neighbourhood Plan area, has been surveyed this year and we have been advised that the paths in this County Wildlife Site are becoming wider and there has been direct trampling of the bluebells which has also been reported as a yearly occurrence.</p>
LBNP18	10/10/2023	Norfolk Wildlife Trust	Community Action 4: Permissive Paths and Recreational Routes			✓		<p>Both County Wildlife Sites (CWS) within the Neighbourhood Plan area were reported as being in an 'unfavourable declining condition' when they were last surveyed in 2021. The causes of this habitat degradation on 'Belt Plantation CWS' was nutrient enrichment, attributed to dog fouling and agricultural run-off.</p> <p>There was also an issue with nutrient enrichment on 'Church & Drive Plantation CWS'.</p> <p>Buckenham Woods, immediately south of the Neighbourhood Plan area, has been surveyed this year and we have been advised that the paths in this County Wildlife Site are becoming wider and there has been direct trampling of the bluebells which has been reported as a yearly occurrence.</p> <p>Due to the pressures on these County Wildlife Sites we would like to request that a 'Community Action includes working with local landowners to identify additional circular walking routes around the settlements that might take some of the pressure off these woodland County Wildlife Sites.</p>
LBNP19	12/10/2023	Strumpshaw Parish Council	Natural Environment			✓		<p>Please note - this was a late representation</p> <p>Lingwood & Burlingham PC are to be congratulated on their Neighbourhood Development Plan (NDP), which is very well and comprehensively researched, designed and written. It is also very dynamic and inspiring in its vision. With respect to the Natural Environment section the following comments and suggestions are made:</p> <p>Para 76: In addition to mention of Natural England statutory designations, the Broads National Park should be included, Britain's largest protected wetland and home to more than a quarter of Britain's rarest wildlife – more than any other national park. It would also be good to include the boundary of the Broad NP in Fig. 19, as this provides significant context to the natural environment within which the NDP is located - just 300m from the NP's northern boundary (i.e. the width of Buckenham Wood). A further important point relates to the SACs and SPAs, which are originally designated under the European Habitats and Bird Directives, respectively; and subsequently transformed into national legislation, meaning that these sites are not just nationally important but they are of European significance.</p> <p>Similarly, Broadland Ramsar Site, listed under The Convention on Wetlands of International Importance especially as Water- fowl Habitat, is of international importance, not just European.</p> <p>Para 78: wording needs clarification as 2 (not 3) County Wildlife Sites are with the NDP area and one (also an Ancient Woodland) is adjacent.</p> <p>In the same paragraph (or elsewhere) it is worth stating: "In terms of connectivity, Buckenham Wood in Strumpshaw Parish provides Lingwood with a stepping stone to connect with the Broads National Park which abuts the southern boundary of this CWS."</p>