

**Tasburgh Neighbourhood Plan Advisory Group comments on Reg 16 consultation responses**

<b>Respondent</b>	<b>Section</b>	<b>Consultation response</b>	<b>Comment from Tasburgh Neighbourhood Plan steering group</b>
<b>National Highways</b>	N/A	No comment	No change
<b>Sports England</b>	N/A	No suggested changes	No change
<b>Norfolk Historic Environment Record</b>	Para 8.10	It is welcomed that the plan now contains a statement about our role (para 8.10). However, we must stress that Non Designated Heritage Assets are not just buildings, but also include known and unknown buried archaeological remains (para 8.10, 8.11 Appendix D and fig.29). We would advise that the authors contacting the Norfolk Historic Environment Record for information about all known historic assets within the parish.	No objection to adding in sentence to para 8.10, 'Norfolk Historic Environment Record can supply further information on historic assets within the parish'.
<b>Resident comment</b>	Various	<p>I have read the draft neighbourhood plan and wish to commend the authors on a well written and comprehensive publication that reflects all what is good about this village.</p> <p>I welcome the policies in general, especially the provision for some business opportunities at the village hall. I note that the site off Church Road is the only one identified for development, which has been the case for several years. My concern is whether the site will be developed to maximise the developer's profits, or for the best interests of the village.</p> <p>The situation in Tasburgh has been partly covered in the plan. It is a popular village, with a good community spirit. When we came here some 40 years ago, we were a young family attracted by the new school and we were among other couples with similar backgrounds and interests, moving into the new houses on</p>	No change, supportive comment that is addressed in various policies.

		<p>the sites either side of Church Road. We all took part in the village: the inter village games sponsored by South Norfolk Council, the extension to the village hall completed in 1995, and so on. Many of those people are still here; very few people leave this village... except the young. Almost all of the children from that 1980s generation have left the village.</p> <p>There are many reasons for that, but certainly one was the absence of affordable, modest houses suitable for a young couple, or single people. Now, that 1980s generation are retired and some are looking to downsize but there are precious few options for modest dwellings or bungalows in Tasburgh. Instead we see recent new dwellings, opposite Flordon Road, for example, being large detached dwellings totally out of reach of local people. That site would have been much better suited to more dwellings along the lines of the modest cottages that can be seen along the Low Road, which then might have appealed to local residents.</p> <p>My plea is that the Church Road site should be a priority for one and two bedroom dwellings that would help solve the housing problem in Tasburgh, both for young and elderly residents, not for executive three and four bed houses that I suspect the developer would wish. Clearly lines of terraces are not a character of the village so the design and layout would be a challenge. I don't know how you could control that aspiration: I suspect that detail would not be possible. We will wait to see what happens.</p>	
<b>Historic England</b>	General	<p>Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:</p>	No change

		<a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>	
<b>Natural England</b>		Natural England does not have any specific comments on this draft neighbourhood plan.	No change
<b>Norfolk Constabulary</b>		<p>I refer to the consultation on the above Neighbourhood Plan.</p> <p>NPS is commissioned by Norfolk Constabulary to prepare representations on infrastructure planning policy matters. Therefore, on behalf of the Constabulary, I would make the following comments, based on the role Norfolk Constabulary have for policing, making the county a safe place.</p> <p>Central Government place great emphasis on the role of the Police and the National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraphs 92 and 130 which state.</p> <p>92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; ....</p> <p>130. Planning policies and decisions should ensure that developments: .....</p> <p>f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p> <p>Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their ‘Secured By Design’ initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live.</p>	Suggest no changes as crime and disorder have not come up as major issues for Tasburgh through consultation exercises.

		<p>The Neighbourhood Plan identifies new housing development will take place in the Neighbourhood Plan area. This will result in an increase in the population which will add pressure to existing police resources in the area. To address this, further investment will be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional pressure will be placed on existing police resources.</p> <p>In terms of creating and maintaining safer communities, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area.</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan identifies the importance that residents have identified on maintaining a safe and secure community (as highlighted on page 23 and reflected in the Plan's Vision. Therefore, the Plan should take the opportunity to include within its objectives (on page 24) to 'create and maintain a safer community and reduce crime and disorder'. This would be consistent with NPPF advice (along with the view of parish residents), and it is disappointing that this consideration is currently excluded.</li> <li>• The Neighbourhood Plan highlights within its provisions the importance of good design. It is therefore surprising that within its Development and Design Policies section, the Plan is silent on crime and disorder issues and fails to offer support for the well-established principles of crime prevention through good design and the 'Secured by Design' approach (as the design and layout of the built environment plays an important role in designing out crime, reducing the opportunities for and risk of anti-social behaviour along with allaying residents' fear of crime and</li> </ul>	
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		<p>disorder). It is considered that Neighbourhood Plan policy should include a provision that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by an objective to 'create and maintain a safer community and reduce crime and disorder'.</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan currently fails to recognise that police infrastructure will play an important role to support development and meet the needs of residents and enhance community safety. It is considered that this omission should be addressed in the Neighbourhood Plan with police services referenced in the Community Infrastructure section.</li> </ul> <p>I trust that these matters can be incorporated into the Plan objectives, policies, and provisions to support / maintain a safe community and reduce the opportunities for crime and disorder (and help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.</p>	
<b>Norfolk Wildlife Trust</b>	TAS1: Natural Assets	<p>The NP area supports a number of priority habitats and species and lies partly in an Environmentally Sensitive Area. There are also 2 County Wildlife Sites immediately adjacent to the NP area; Pecks Plantation CWS and Tasburgh Redpoll Meadow CWS. Policy TAS1 will be important in providing protection and enhancement for these important habitats and species.</p> <p>We support Policy TAS1. However, we would recommend additional wording (or similar wording) as described below.</p> <p>To ensure that any development within the NP area minimises adverse impacts on the neighbouring County Wildlife Sites:</p>	<p>There are no County Wildlife Sites within the parish of Tasburgh, therefore protection lies outside the Neighbourhood Area.</p> <p>Regarding green roofs – this is not supported by the consultation undertaken on the Neighbourhood Plan.</p>

		<p>'The creation of buffer zones, as appropriate, to protect sensitive wildlife habitats such as ponds, woodland, wetlands and the adjacent County Wildlife Sites from any indirect impacts from development, such as light pollution.</p> <p>Developments to include green roofs where appropriate. Any new community buildings to include a green roof and green wall wherever possible.</p> <p>To minimise adverse impacts from pollution on these natural assets we would also recommend including similar wording to the following:  'Development proposals should demonstrate that due care has been taken to ensure that any associated pollution from greenhouse gases, dust, noise, litter, vibration, light, odour, waste, chemical or other sources will not have a significant negative impact on the natural environment or the community. Cumulative impacts should also be taken into account.'</p> <p>We also recommend that a map showing all the green infrastructure in and adjacent to the NP area, including any identified green corridors and the adjacent County Wildlife Sites, is included in the plan. This will make it more effective in targeting where the best gains can be made regarding biodiversity net gain and delivery of additional green infrastructure.</p>	
<b>Norfolk Wildlife Trust</b>	TAS2: Local Green Spaces	We fully support Policy TAS2 and welcome the 6 designated Local Green Spaces.	No change
<b>Norfolk Wildlife Trust</b>	TAS4: Climate Change, flood risk and	We note the high risk of flooding in some parts of the NP area. Redpoll Meadow County Wildlife Site (adjacent to the NP boundary) is also in a high risk area for flooding, therefore any development adjacent to this could potentially lead to adverse effects on this site.	There are no County Wildlife Sites within the parish of Tasburgh, therefore protection lies outside the Neighbourhood Area.

	surface water drainage issues	<p>SuDS will be crucial in helping to minimise the flood risk with its associated adverse impacts, including water pollution downstream of development. In addition, SuDS and trees incorporated into streets can create a high quality, green setting for new homes. As water quality impacts on nearby wildlife sites is cumulative, we therefore recommend that policy wording should recommend SuDS should be incorporated, proportionally, into all new developments, for example:</p> <p>‘All proposals should incorporate Sustainable Drainage Systems appropriate to the scale and nature of the development to ensure they do not add to cumulative water quality impacts on nearby wildlife sites. They should be designed to be an integral part of the green infrastructure and designed to benefit wildlife unless otherwise justified. These may include: Attenuation ponds; Planting; Introduction of permeable driveways or parking areas; Rainwater harvesting and storage features; Green roofs.’</p>	SuDs is in TAS4.
<b>Norfolk Wildlife Trust</b>	TAS5: Dark Skies	<p>We note that there are at least seven species of bat using the river valley, some of which are priority species. The area is also rich in other wildlife species including priority species. Light pollution has an overall negative impact on bats and other wildlife, and species are affected in many different and numerous ways. 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 below.</p> <p>We are pleased that dark skies are valued in Tasburgh and note that residents are used to not having street lighting. We support the policy on Dark Skies and particularly that any new development should not have streetlights. However, to maximise the protection of bats and other wildlife we would suggest further specific wording at the end of the 2nd paragraph:</p> <p>'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats</p>	No objection to adding in sentence about bats.

		( <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> ). 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.'	
<b>Environment Agency</b>	Flood risk	The Draft Neighbourhood Plan includes areas which are located in Flood Zone 2 and 3. In accordance with the National Planning Policy Framework (NPPF) paras 159-165, we remind you that the Sequential Test and Exception Tests should be undertaken if the plan is proposing development or promoting growth to ensure development is directed to the areas of lowest flood risk taking climate change into account. The application of the Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA).	This is covered by the Local Plan and the NPPF
<b>Environment Agency</b>	Water Resources	Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies. New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure	This is covered by the Local Plan and the NPPF



		<p>a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>).</p>	
<b>Environment Agency</b>	Groundwater Protection	<p>Your plan includes areas which are located on Principal Aquifers and in Source Protection Zone 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance:  <a href="https://www.gov.uk/government/collections/groundwater-protection">https://www.gov.uk/government/collections/groundwater-protection</a></p>	No change, flood zone is not near the allocated site
<b>Environment Agency</b>	Informative	<p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning</p>	No change

<b>Anglia Water</b>	TAS4	<p>Additional Commentary:</p> <p>TAS4 Climate Change, flood risk and surface water drainage issues: Whilst we welcome the amended policy and inclusion of sustainable drainage systems (SuDS). We would seek clarification regarding ‘large development’ and whether this only has regard to major developments as defined by the Town &amp; Country Planning Development Management Procedure Order (2015). As it is the Government’s intention to implement Schedule 3 of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024, we would support a policy approach which reflected these aims.</p> <p>Paragraph 6.29: We note the matter that has been raised by a local resident regarding sewer flooding in Flordan Road during periods of heavy rain. This will be raised with our operational teams and any updates will be sent through to the Parish Council to help inform and update as necessary this statement in the supporting text. Our Drainage and Wastewater Management Plan 2025-2050 for Hempnall-Fritton Road water recycling catchment identifies that for the networks in this catchment there will be mixed strategies, with the main solution being SuDS, and in the longer term 50% surface water removal.</p>	No objection to adding in definition of ‘large scale development’ as ‘10 dwellings or more’.
<b>Norfolk County Council</b>	TAS1: Natural Assets	<p>We are pleased to note that ‘important natural assets’ have been identified. The ‘enhancing biodiversity’ section is also supported from an ecological perspective. However, it is advised that the “loss of natural asset” paragraph is rephrased; features such as veteran trees and ancient woodland are considered to be ‘irreplaceable habitats’ and as such it is not appropriate for these features to be lost or damaged and simply mitigated by replacement planting.</p> <p>Figure 16 (Natural Assets in Tasburgh) provides a useful visualisation of the key environmental features of the Parish; it is recommended that the Parish Council engages in the development of the forthcoming Norfolk Local Nature</p>	<p>No objection to amending the wording of ‘loss of natural asset’ section.</p> <p>Figure 16 – supporting comment, no change.</p>

		Recovery Strategy (LNRS) as the identification of these locally important features could form a valuable aspect of the county-wide strategy.	
<b>Norfolk County Council</b>	Policy TAS5: Dark Skies	This policy is supported from an ecological perspective. Should you have any queries with the above comments please contact the Natural Environment Team at <a href="mailto:neti@norfolk.gov.uk">neti@norfolk.gov.uk</a> .	No change
<b>Norfolk County Council</b>		<p>Lead Local Flood Authority</p> <p>3.1. Thank you for your consultation on the Tasburgh Neighbourhood Plan 2023 - 2038 (Regulation 16) Submission Draft July 2023 (LLFA Reference: FW2023_1000) received on 25th October 2023. The LLFA advise that we have also previously provided comments on the Tasburgh Neighbourhood Plan 2023-2038 (Regulation 14) Pre-Submission Draft March 2023 (LLFA Reference: FW2023_0421) as part of the NCC Corporate response.</p> <p>3.2. The LLFA comments at Regulation 16 stage are as follows:</p> <p>3.3. The LLFA welcome that references are retained in the Draft Neighbourhood Plan and its proposed policies to flooding from sources such as surface water and rivers (fluvial from the River TAS), as well as the need to protect the environment and consider the impacts of climate change. It is noted that reference has now been made to groundwater flooding within Paragraph 6.31 of the document. Of the 14 no. proposed policies and Community Actions Projects, Policy TAS2: Local Green Spaces and Policy TAS4: Climate Change, Flood Risk and Surface Water Drainage Issues and their supporting text within Section 6 along with Objective 1, Figure 20 and Figure 21 and the Tasburgh Design Guidance and Codes document, are of most relevance to matters for consideration by the LLFA.</p>	

3.4. The LLFA further welcomes references retained within Policy TAS4 of the Regulation 16 document to the need for guidance by relevant Agencies such as the LLFA and Environment Agency to be adhered to in respect of flood risk management, drainage and flooding matters. However, no reference has made in the document to the relevant IDB, in this case being the Norfolk Rivers Internal Drainage Board, with no mapping included to identify which part of the Parish this relates to.

3.5. It is welcomed that the Regulation 16 document retains reference to the majority of the Parish being at low risk of surface water flooding (apart from identified areas such as Low Road where surface water flooding has occurred in the past as recognised in NCC Investigation Report into the Countywide Flooding of Summer 2021). However, as previously noted in our Regulation 14 response, some areas lie within Flood Zone 3 and as such the LLFA consider that this section would benefit from the inclusion of Environment Agency mapping to clearly identify such areas. The LLFA welcome that Paragraph 6.3.1 now recommends that the assessment of all sources of flooding and their implications upon new development in the Parish of Tasburgh, be carried out in order to fully assess flood risk in the Parish from all sources including groundwater and ordinary watercourses and supported by relevant mapping (covering the whole Parish Neighbourhood Plan Area), along with further consideration given to the impacts of climate change on new development and the surrounding landscape, it does not appear that this has been carried out as part of the Regulation 16 submission.

3.6. The LLFA welcome references retained in the Regulation 16 document to ensuring all new development does not exacerbate existing surface water drainage problems or lead to new ones either through surface water run off or displacement and refers to the use and benefits of incorporating SuDS features in all new development, particularly within the Climate Change, Rivers and

No objection to including the IDB mapping.

No objection to adding in the following map:



No objection to adding a reference to the SuDS four pillars

		<p>Flooding Section. Whilst it is welcomed by the LLFA that the supporting text for Policy TAS4 has been enhanced in the Regulation 16 document to reference SuDS, but also the four pillars which it seeks to achieve, namely water quality, water quantity, biodiversity, and amenity, the LLFA still consider that it would be beneficial for this to be included within the policy text also.</p> <p>3.7. The LLFA note and welcome the retention of references made in the Regulation 16 document to the Tasburgh Neighbourhood Plan complimenting the Strategic Policies which deal with matters relating to flooding, drainage and climate change such as the Joint Core Strategy for Broadland, Norwich and South Norfolk' (JCS), the emerging Greater Norwich Local Plan (GNLP) and the National Planning Policy Framework.</p> <p>3.8. The LLFA still recommend reference be made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document' (the most up to date version at the time of adoption) within the Neighbourhood Plan regarding surface water risk and drainage for any allocated sites or areas of proposed development. This document is available from the "Information for developers" section of the Norfolk County Council website.</p> <p>3.9. According to LLFA datasets (extending from 2011 to present day), we have 1. no record of internal flooding and 1 no. record of external/anecdotal flooding in the Parish of Tasburgh. 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>3.10. We advise that Norfolk County Council (NNC), as the LLFA for Norfolk, publish completed flood investigation reports here.</p>	<p>No change</p> <p>No objection to adding a reference to the guidance document.</p> <p>No objection to put a sentence in the Plan such as 'The Parish Council will endeavour to report surface water drainage issues'.</p>
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	<p>3.11. We are not aware of AW DG5 records within the Parish of Tasburgh, however this will need to be confirmed with/by Anglian Water.</p> <p>3.12. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Tasburgh.</p> <p>3.13. The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at: GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map</p> <ul style="list-style-type: none"> <li>▪ Norfolk County Council (NCC) – Flood and Water Management Policies</li> <li>▪ Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document</li> </ul> <p>3.14. Allocation of Sites</p> <p>3.15. We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (however it is noted that as was the case in the Regulation 14 Document, no housing is being allocated, only additional policy text to proposed Policy VC TAS1: North of Church Road within the Emerging South Norfolk Village Clusters Housing Allocations Plan as included Policy TAS9: Site North of Church Road of the Neighbourhood Plan). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.</p>	<p>No objection to adding in further maps.</p> <p>The Neighbourhood Plan is not allocating the site.</p>
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<b>Norfolk County Council</b>	Minerals and Waste	<p>4. Minerals and Waste 4.1. Thank you for consulting us about the draft Tasburgh Neighbourhood Plan (reg 16).</p> <p>4.2. It is welcomed that the plan now contains a statement about our role (para 8.10). However, we must stress that Non Designated Heritage Assets are not just buildings, but also include known and unknown buried archaeological remains (para 8.11, Appendix D and fig.29). We would advise that the authors contacting the Norfolk Historic Environment Record for information about all known historic assets within the parish.</p> <p>4.3. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at <a href="mailto:steve.hickling@norfolk.gov.uk">steve.hickling@norfolk.gov.uk</a></p>	As above.
<b>South Norfolk Council</b>	General comments	The Plan is well laid out and easy to follow. The policies are generally well justified and thought out. It is positive to see that the Council's previous comments have, for the most part, been incorporated into the submitted Neighbourhood Plan.	No change

<b>South Norfolk Council</b>	Policies Map	While maps have been provided for individual policies, it does not appear that a comprehensive Policies Map, showing all of the areas affected by all policies, has been included. The Council would recommend that this is provided in order that the Plan can be accessible and to assist policy presentation, in line with paragraph 16 e) of the NPPF.	No objection to draw up a policies map.
<b>South Norfolk Council</b>	Page 38 – Policy TAS1 Natural Assets	The Council considers that this is a positive policy that takes a proactive approach to protecting the natural environment. The natural assets appear to be well justified and the policy includes guidance to follow when loss or damage to an asset is unavoidable. Specific guidance on delivering BNG is also supported, particularly the inclusion of creating connections between fragmented habitats. The Council does however consider that the section of “Loss of natural assets” should be expanded to cover off-site mitigation/compensation. Whilst it is reasonable to seek on-site mitigation/compensation as the sequentially preferable option in most circumstances, there may be circumstances where on-site mitigation/compensation cannot be achieved, or where off-site mitigation/compensation may be more beneficial in landscape and/or biodiversity terms. In order to ensure that the clarity required by paragraph 16 d of the NPPF is achieved, the Council considers that the policy should be amended in this way.	No objection to include off-site mitigation if no alternative to be found, although Norfolk Wildlife Trust have a differing view.
<b>South Norfolk Council</b>	Page 48 – Policy TAS4 Climate change, flood risk and surface water	The Council feels that the term, ‘large development’ needs to be defined. Is this the same as Major Development (10+ dwellings or 0.5+ hectares)? Without a definition of what this is or consistent use of terms it will be difficult for officers to apply this policy consistently. The Council considers that this should be defined in order to bring the clarity required by paragraph 16 d) of the NPPF.	No objection to adding in definition of ‘large scale development’ as ‘10 dwellings or more’.



	drainage issues		
<b>South Norfolk Council</b>	Page 49 – Policy TAS5 Dark Skies	The Council considers that the last line should be reworded to state that this ‘will not be permitted’ or ‘will not be supported’, to provide the clarity required by the NPPF.	No objection to amending wording.
<b>South Norfolk Council</b>	Page 52 – Figure 23	There is no key on this map to distinguish between the 3 different character areas. The Council considers it would be helpful for a key to be provided to show which colour represents which area, in order to provide the clarity required by the NPPF.	No objection to adding in a key
<b>South Norfolk Council</b>	Pages 53/54 – TAS6 Design guidelines and codes	<p>The Council previously raised a concern that the area of the proposed TAS1 allocation (as proposed in the Village Clusters Housing Allocations Plan) would appear to be designated as part of the ‘Transition Area’, as set out within this Policy. The Council remains of the opinion that the allocation site is more appropriately read in the context of Upper Tasburgh, with the more historic, rural elements of the village largely lying in the area beyond Old Hall Farm Bungalow.</p> <p>In addition, the extent of the ‘Transition Area’ covers the open space of the Tasburgh Enclosure. Presumably the development guidelines for this character area, as set out in the policy, should not apply to such a sensitive archaeological and heritage site?</p> <p>On this basis, the Council remains of the opinion that the Transition Area boundary should be amended so that the proposed allocation site is incorporated within the ‘Upper Tasburgh’ character area and so that the boundary follows the road and existing residential development, without extending into the open fields.</p>	<p>The ‘Historic Core and Transition’ area is to reflect the character of both Upper and Lower Tasburgh, including the heritage of the adjacent area. The TAS1 allocated site is situated opposite an area of transition of character. If TAS1 is designed with transition in mind, there will be a blend from Upper to Lower Tasburgh. No objection to using the rationale from the Design Code within the Neighbourhood Plan itself – wording of page 28 (2.3.3) of the Design Guidance and Codes document.</p>

		<p>The Council considers that these changes are necessary in order to ensure that the policy is clear and precise and that it contributes to sustainable development, in accord with paragraph 16 of the NPPF.</p>	<p>The 'Transition Area' should be called 'Historic Core and Transition' area. This covers the issue of the a sensitive archaeological and heritage site.</p> <p>The Neighbourhood Plan is not resisting the allocated site, but is looking to promote a development that genuinely reflects the character of the area and delivers a well-designed development.</p>
<b>South Norfolk Council</b>	Page 57 – TAS7 Housing location, pattern and scale	<p>The Council previously raised a concern that the section of the policy dealing with the 'Gap between Upper and Lower Tasburgh' could be more positively written as well as being more precise, in terms of the area being referred to. Although some wording has been removed, the removal of the second sentence (commencing 'Development that would individually or cumulatively erode...') would help to ensure that this part of the policy is positively worded. In addition, the Council remains of the opinion that a clearer and more precise map, setting out the precise boundary of the gap between the two areas, would help to ensure the clarity of the policy. Currently, it is not apparent from Figure 24 that such a gap exists.</p> <p>Such amendments will help to bring the clarity and positive wording required by the NPPF (paragraph 16).</p>	<p>No objection to adding in description that refers to the gaps the area between the two settlement boundaries (figure 4).</p>
<b>South Norfolk Council</b>	Page 64 – TAS8 Housing Mix	<p>This policy states that there is a greater need for affordable housing and specialist housing in the parish. The Council considers that the policy should be amended to improve its clarity, as required by paragraph 16 of the NPPF. The Council suggests that the first sentence of the paragraph under the heading</p>	<p>No objection to amending the sentence to 'In line with the findings of the Tasburgh Housing Needs Assessment,</p>

		<p>'Affordable Housing', is amended to 'In line with the findings of the Tasburgh Housing Needs Assessment, opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'</p>	<p>opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'</p>
<p><b>South Norfolk Council</b></p>	<p>Page 68 – TAS9 Site north of Church Road</p>	<p>The Council has previously commented that it is not clear if the provision of a children's play area would exceed open space standards. The policy as it is currently worded still does not make this clear. The inclusion of the play area as a distinctly separate criteria does make it appear as an additional requirement to the general open space required. It is acknowledged that criteria 'b' does state that the play area should be delivered where possible; however the concern remains as to why the development would justify being required to deliver more open space than needed to meet the additional demands arising from development. The Council is concerned that this does not meet the NPPF requirement for plans to be 'aspirational but deliverable' (para. 16 b) and to be 'based on proportionate evidence' (para 35 b).</p> <p>Criteria 'f' as it is written conflicts with the emerging policy VC TAS1 in the emerging South Norfolk Village Clusters Housing Allocations Plan. As stated in previous comments, the requirement for vehicular access from both Church Road and Henry Preston Road was determined by consultation with Norfolk County Council Highways in order to make the access acceptable. As Government guidance states, 'although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.' Therefore the Council considers that this element of the policy is not in accord with the basic conditions with which the Neighbourhood Plan should be in conformity.</p>	<p>Para 7.16 and 7.17 covers the justification for both comments.</p> <p>Criteria (b) is to serve the development and community. Criteria (e) is for landscape and aesthetic value.</p> <p>Criteria (f) – this is strongly felt by the community on the grounds of further traffic congestion and pedestrian safety next to the primary school.</p>

<b>South Norfolk Council</b>	Page 38 – TAS1: Natural assets	There is a typo at the end of the first line, referring to figures – both refer to figure 15.	No objection to amending text to 'figure 15 and 16'.
<b>South Norfolk Council</b>	Page 61 - Paragraph 7.11	In the third bullet point of this paragraph, it states '...to accommodate the 25 percent First Homes requirement mandated nationally...'. This figure is not 'mandated nationally' – it is a minimum requirement which can be exceeded if necessary.	These were the conclusions of the AECOM Housing Needs Assessment.