

Croxton, Brettenham and Kilverstone Neighbourhood Plan

Submission Plan for Regulation 16 Consultation

Ref	Received	Organisation	Page and Policy / Paragraph No	Comment	Suggested Change
01/01	05/02/18	CLH Pipeline System Ltd	N/A	Sent map showing pipeline in Brettenham Parish area (east of Thetford). We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline.	
02/01	09/02/18	Amec Foster Wheeler on behalf of National Grid		<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high pressure gas pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM03 - Roudham Heath to Gt Wilbraham <p>From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p>	
03/01	13/02/18	Norfolk Geodiversity Partnership		Basic Conditions Statement	
			Page 11. JNP6 Natural Environment	<p>No mention is made of geodiversity / geological features in these paragraphs, contra NPPF section 109 and 117. It is also contra Breckland Core Strategy CP10, 'Natural Environment. Enhancement of Biodiversity and Geodiversity' which states "here is an expectation that development will incorporate biodiversity or geological features where opportunities exist. Development that fails to exploit opportunities to incorporate available biodiversity or geological features will not be considered appropriate. It is evident that the needs of geological conservation, geodiversity and Earth heritage have</p>	<p>The Basic Conditions Statement needs amending to explicitly recognise geodiversity within its scope.</p> <p>The Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan needs to be rewritten in conformity with Core Strategy CP10 and NPPF sections 109 and 117.</p>

				not been adequately scoped as aspects of the natural environment of Breckland.	
				Neighbourhood Plan	
03/01			Page 25. Vision for the Parishes	An observation. Geodiversity features needs to be incorporated into Green Infrastructure wherever possible. Such features include natural landform features and geological exposures. See paragraph 1 of Core Strategy CP10.	n/a
03/02			Page 30. JNP1: Housing Design & Materials	<i>d) The use of traditional materials common in the parish (as identified in the Character Appraisal work), especially those sourced locally and of low ecological/environmental impact, will be encouraged.</i> The word 'locally' needs qualifying, We are concerned that flint will not be black flint sourced from the Brecks but grey flint sourced from outside the subregion, and hence not local. We consider that wooden building materials should be locally-sourced, particularly from Thetford Forest.	<i>The use of traditional materials common in the parish (as identified in the Character Appraisal work), especially those sourced within the Brecks and of low ecological/environmental impact, will be encouraged.</i> <i>N.B. [d] & Bold added by BDC for clarity]</i>
03/03			Page 42. Natural Environment	The policy statement makes no mention of geodiversity features among Natural Environment assets (contra NPPF sections 109 and 117), although these are explicitly mentioned in the Character Appraisal. The Brecks is notable for its distinctive geodiversity, including periglacial landforms and geological exposures which provide windows into the remote past including evidence for early humans. Examples occur in the Neighbourhood Plan (NP) area. These should be scoped and valued as part of development planning and then conserved or enhanced through the NP process.	Paragraph 2. <i>Where possible existing natural features such as trees or hedgerows, should be retained unless their removal results in an ecological gain or an improvement to a green open space or important views. Geodiversity features such as periglacial landforms and geological exposures should</i>
03/04			Pages 70-80. Appendix A.CharacterArea maps	Geodiversity features should have been comprehensively scoped within Character Area mapping.	Add geodiversity features to Character Area maps for Croxton, Brettenham, Kilverstone

03/05			Page 81. Appendix B. Heritage Assets – Croxton	We note with approval the inclusion of 'Dolines' and 'Devil's Punchbowl' as 'Non-designated Landscape Features'. The latter is a Candidate Norfolk County Geodiversity Site and Geological Conservation Review Site 1112 of national importance. We note the omission of the many farmland marl pits and gravel pits from the list. These are local historical features which may provide access points for geological research as well as wildlife habitat.	Mention of agricultural chalk and gravel pits (both active and disused) as assets for geodiversity, biodiversity and cultural heritage.
03/06			Page 82. Appendix B. Heritage Assets - Brettenham	We note with approval the inclusion of 'River Thet' and 'Little Ouse River' as 'Non-designated Landscape Features'. However we note the omission of three Candidate County Geodiversity Sites from the list: Brettenham Church Pit, Shadwell Park Pit and Snare Hill Hall Pit. These are significant as exposures of Pleistocene sand on river terrace deposits from which Palaeolithic flint artefacts have been recovered. We also note the omission of the many farmland marl pits and gravel pits from the list. These are local historical features which may provide access points for geological research as well as wildlife habitat. We also note the omission of periglacial patterned ground in the Snare Hill area from the list.	Mention of the three named pits and sundry unnamed farmland pits as assets for geodiversity, biodiversity and cultural heritage; Also a mention of periglacial patterned ground as a geodiversity asset.
03/07			Page 83. Appendix B. Heritage Assets – Kilverstone	We note the omission of Langmere Hill Pit from the list, a Candidate County Geodiversity Site designated for its Cretaceous geology. We also note the omission of the many farmland marl pits and gravel pits from the list. These are local historical features which may provide access points for geological research as well as wildlife habitat.	Mention of the named pit and sundry unnamed farmland pits as assets for geodiversity, biodiversity and cultural heritage.
				Character Appraisal	
			Character Appraisal, section 6: Croxton	The Character Appraisal has not adequately scoped the geodiversity features in Croxton parish, and thus falls short of the policy guidance of NPPF sections 109 and 117 and Breckland Core Strategy CP10. It has mentioned some features such as natural springs and the Devil's Punchbowl doline, but not as part of a comprehensive evaluation of the contribution	Geodiversity needs comprehensively to be scoped for Croxton, and a paragraph written to include the features of geology, geomorphology and soils which underpin the landscape and historical character of

				of the physical landscape to the character of the parish.	the parish.
			Character Appraisal, section 7: Brettenham	The Character Appraisal has not adequately scoped the geodiversity features in Brettenham parish, and thus falls short of the policy guidance of NPPF sections 109 and 117 and Breckland Core Strategy CP10.	Geodiversity needs comprehensively to be scoped for Croxton, and a paragraph written to include the features of geology, geomorphology and soils which underpin the landscape and historical character of the parish.
			Character Appraisal, section 8: Kilverstone	The Character Appraisal has not adequately scoped the geodiversity features in Kilverstone parish, and thus falls short of the policy guidance of NPPF sections 109 and 117 and Breckland Core Strategy CP10.	Geodiversity needs comprehensively to be scoped for Croxton, and a paragraph written to include the features of geology, geomorphology and soils which underpin the landscape and historical character of the parish.
04/01	19/02/18	Environment Agency	N/A	We have no further comment to make at this time.	
05/01	21/02/18	Historic England	N/A	I have now had the opportunity to review the latest version of the Plan and do not wish to comment further at this stage.	
06/01	14/03/18	Natural England	N/A	Natural England does not have any specific comments on this draft neighbourhood plan.	
07/01	14/03/18	Norfolk County Council		The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.	<i>[N.B. Referenceing in fourth column added by BDC for clarity]</i>
07/02		Environment	<i>p15, Section 2: Life in Croxton and Brettenham & Kilverstone today</i>	The County Council supports the neighbourhood plan, however, does have the following suggestions: There appears to be some confusion as to the conservation status of the designated sites (paragraphs 2.3. to 2.6). While it is noted that in the context of the section, the document is referring to a landscape area or type “the Brecks” (paragraph 2.3), the subsequent paragraphs on designated sites do not	

				really fit in to that definition.	
07/03				In paragraph 2.5, it is agreed that a significant proportion of the Brecks is designated under European legislation. Part of Breckland is a designated Special Protection Area (SPA), a designation for protection of priority bird species (under the Birds Directive), but this is comprised of areas of both the nationally-designated Breckland Farmland SSSI and Breckland Forest SSSI. Paragraph 2.5 appears to be referring to the designation of Special Area of Conservation (Breckland SAC, designated under the Conservation of Habitats 2 and Species Regulations 2017), although the actual designation is not mentioned.	
07/04				In paragraph 2.6, the document states “The rich biodiversity of the Brecks is also recognised by many other statutory conservation designations which include four Special Areas of Conservation (SACs), numerous Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), where the latter (NNRs and SSSIs) make up 40% of the total area.” At this point, the definition of “the Brecks” landscape area becomes more confused. As defined above, there is only one SAC in “the Brecks” (the Breckland SAC) and two SSSIs (Breckland Farmland and Breckland Forest), although these comprise a number of component units. However, there are other SSSIs and other SAC/SPAs within the wider district boundaries and it may be these to which the document is alluding. Even in that context it is unclear as to what area the 40% is referring to.	
07/05			<i>p25, Section 3: A vision for the Parishes</i>	The County Council supports the Vision, Aims and Objectives set out in the Plan (pages 25 - 27). In particular the County Council supports the environment and communities facilities objectives.	
07/06		Infrastructure	<i>p47 para 4.39.</i>	The neighbourhood plan has considered and incorporated	

		Delivery		previous comments regarding infrastructure delivery. The County Council supports paragraph 4.39, the reference to the installation on sprinklers in all new developments.	
07/07			<i>p50 Policy JNP 10 Surface Water Drainage and Flooding</i>	The County Council supports the inclusion of the flooding policy proposed by the LLFA in the response to the Regulation 14 Consultation Draft.	
	15/03/18	Thetford Town Council			
08/01			Para 2.15 & 2.16	Paragraphs 2.16 & 2.16 are superfluous due to the expressed content of 2.16	Remove
08/02			Pg 25	The transition from urban to rural was addressed in the TAAP with a planning recommendation that the new development “soften the edges” resulting in the density now being lower than previously envisioned. It is felt that the vision also has to deliver the connectivity with the town centre of Thetford rather than ignore it.	Update
08/03			Pg 27	The JNP suggest that the cemetery and community provision needs to be accommodated within the SUE, but there is no vision of where they will be sited or how it will be funded in the long term. The plan gives no detail as to how the identified allotment sites on the plans, will be administered by the respective parishes. Modern housing densities rarely offer the privilege of areas suitable for fruit and vegetables to be grown by the residents.	Update
08/04			Pg 28/29	In the policy table JNP1 & JNP2 (in reference to the SUE) are covered by the TAAP, so to suggest single policies be area wide does not differentiate between the differing needs of the existing parishes.	Amend
			Pg 34	JNP 3 is supported	
08/05			Pg 38	JNP 4 para 1. It is unlikely that sufficient material exists to flint face all the buildings in the SUE development.	

				<p>Para 2 is in direct contravention of detailed planning applications already submitted.</p> <p>Para 4c uses the term use of materials that reflect and respect the local vernacular, which is weak in policy terms. This is so vague as not to be useful in planning policy terms. In regard to local vernacular when the use of flint is considered essential, it should be laid in the traditional manner and not laid in prefabricated building blocks with flint inclusions..</p>	
08/06			Pg 42	JNP6 The weaknesses of this policy are already identified in the Breckland District Council response.	Amend
08/07			Pg 44	<p>JNP 7 makes no specific requirement to provide alternative cycle or pedestrian routes parallel to Brettenham Lane Kilverstone, which would be required for the safety and enjoyment of future residents.</p> <p>Consideration also required how Brettenham and Kilverstone Parish Jointly should seek pedestrian and cycling connectivity between their relevant communities. (Kilverstone Village-Arlington Way-Rushford Village). Supportive of enhancing this site but consideration should be given to the adjacent recreational space.</p>	Amend
08/08			Pg 45	Given the scale of the SUE there is an undoubted need for extra parking at Thetford train station including enhanced disabled access linking the platforms to serve the new residents of the SUE and that S106 contributions may facilitate this.	
08/09			Pg 46	<p>JNP8 fails to recognise that a significant proportion of community facilities will be derived from Thetford Town Centre and other areas within Thetford, and that S106 contributions may be required.</p> <p>There is a clear opportunity that existing farm buildings and the like to be developed in a sympathetic manner for community use reflecting heritage and previous use. It would be expected that the JNP reflects this more strongly.</p>	Amend

08/10			Pg 49	JNP 9 Maybe suitable concerning existing village cores but fails to reflect the significant employment areas that will be within the SUE, so needs to develop the policy further. Aspects of this provision are reflected in outline planning permission for SUE.	Amend
08/11			Pg 50	JNP 10 repeats other policies so is superfluous.	Remove
08/12			Pg 52	JNP 11 Weakness of policy adequately covered by BDC response.	
08/13			Pg 59	JNP 13 Surprised that aspects of Arlington Way are not identified as green spaces, as parishes have worked vigorously to protect them in the past. The picnic area next to Melford Bridge requires significant enhancement as it is the gateway to both town and villages.	Identify spaces and amend policy accordingly
08/14			Pg 67	JNP 16 is supported as it has the potential to provide edge of town tourist parking for visitors. Allowing visitors to enjoy both town and villages as well cycle paths.	Amend
08/15				Notes: In general terms with find nothing in Breckland District Council's response to disagree with.	
09/01	15/03/18	Andy Cruse	<i>See attached form</i>		
10/01	16/03/18	Anglian Water	<i>p50 Policy JNP 10 Surface Water Drainage and Flooding</i>	The submission version of the Neighbourhood Plan includes an additional policy relating to surface water drainage and flooding. Reference is made to applications within the district being required to incorporate Sustainable Drainage proposals (SuDs). Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.	<i>[N.B. Referenceing in fourth column added by BDC for clarity]</i>
11/01	16/03/18	Breckland District Council	<i>See attached form Appendix A</i>		