

Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan
Draft Reg.16 Consultation Draft – Policy & Technical

Page and Policy/ Paragraph No	Comments	Justification for comment and suggested change	Suggested amendments or course of action
Whole Plan	Use of images - We welcome the introduction of more images, in the form of photographs and maps, which has enhanced the appearance of the plan.	Individuals have different learning styles and the use of different mediums enhances this.	
Whole Plan	As previously advised, the plan could recognise more, in policy terms, the significance of the SUE and its role and relation to the town of Thetford. Despite its physical position in the Parish of Croxton, Brettenham and Kilverstone, it is not necessarily appropriate to apply the same policies to the rural villages as to a large urban extension, which was highlighted in a number of our original comments. Furthermore some of the policy restrictions are restrictive, affecting viability and deliverability of development therefore not supporting sustainable development.	<i>'Take account of the different roles and character of different areas...'</i> para 17, bullet point 5 (NPPF). Also sustainable development is one of the Basic conditions.	See specific comments outlined below.
p7, para 1.2	It is more accurate to describe Neighbourhood Plans as being 'made' not 'adopted' - this a term used for Local Plans.	Regulations use different terms for Neighbourhood and Local Planning.	Replace 'adopted' with 'made'.
p7, Introduction and context section	It is welcomed that the SUE is now referred to in para 1.6 - 1.10, it could be beneficial to add more detailed context for Thetford SUE, as an individual section drawing on the work which has already been established (TAAP and planning application), due to the significance of the SUE in forming the key housing growth for Thetford and the parishes. This does not need to be extensive, but as there are 9 pages of context and scene setting, it might help to have a small section (half a page) on the most significant development proposal proposed for the parish.	Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE and its purpose as a sustainable urban extension to Thetford.	Add a concise section on the Thetford SUE as part of the Introduction and context chapter.

p10 -14, Maps	As previously advised*, it would be useful to locate the maps near to the text where they apply.	To aid clarity and clearer why the maps have been included.	Locate maps to where they apply e.g. Map 3 on p44, (as has been done with Map 6) or use cross referencing e.g. makes ref in para 1.10 to Map 1, in para's 2.7 & 2.21 to Map 2, para, as has been done with Maps 4 in para 4.30.
p10, Map 1	It would be useful if the key on the map made it clearer where the SUE was originally designated.	To aid understanding of the plan.	Make reference to the fact that the SUE was originally designated in the Thetford AAP.
p13, Map 4: Croxton Settlement Boundary	It is not clear why there is a settlement boundary map for Croxton as it is proposed to be removed in the emerging Local Plan, which is at an advanced stage and currently subject to examination. The map addresses a strategic issue concerning the provision of housing.*	General conformity with the strategic policies contained in the development plan for the area of the authority. This is a Local Plan issue as outlined in para 2.17 of this plan.	Remove Map 4 to avoid duplication with the Local Plan. <i>See comments below re p17, Croxton, para 2.17.</i>
p17 Croxton, para 2.17	The text is not consistent with also including a map for Croxton and this inclusion will alter the boundary, as the emerging Local Plan proposes to remove it and replace the boundary with a criteria based policy approach.*	To ensure a consistency of approach within the emerging Local Plan.	Delete map or amend text.
p15, para 2.3-2.6	We welcome the introduction of the additional clarifying text regarding 'the Brecks'.		
p25, Vision	We would suggest the desire for a predominantly 'rural and tranquil' character may not fit with the character of the SUE, which by definition is an 'urban' extension" for 5000 homes. Whilst within the parish, the SUE is directly adjoined to the large market town of Thetford, which has a very different character to the villages of Croxton, Kilverstone and Brettenham. While it is entirely reasonable for the Neighbourhood Plan vision to seek to enhance and protect the rural and tranquil character of existing villages, it should recognise the connection between Thetford and its urban extension and consider how this sits with the vision for the urban extension contained in the adopted Thetford Area	The Neighbourhood Plan recognises the significance of the SUE and its purpose as a sustainable urban extension to Thetford.	Further consideration of the connection between the urban extension, Thetford and the rest of the parish is needed.

	Action Plan (p21 and p81) and the outline planning permission 3PL/2011/0805/O.*		
p26, Objectives, Environment, 3 rd & 4 th Bullet points	The use of the word ' <i>protect</i> ', in planning terms has specific implications. This implies no works what so ever, where use of ' <i>preserve</i> ', will enable enhancement works to take place e.g. replacement windows from UPVC to timber in historic buildings.*	Appropriate planning wording is required in policy.	Change word ' <i>protect</i> ' to ' <i>preserve</i> '.
3 rd Bullet point	The Plan still needs to define why the 'break' between Croxton Village and A11 is important.*	If it is not possible to define why the break is needed, then it's unclear why the policy response is to protect it.	Add text clarifying why the break is needed in the plan.
4 th Bullet point	It is suggested that the use of ' <i>enhance</i> ' will enable the improvement of views into and out of these gaps. Although the response in the Consultation Statement has agreed with is amendment, the plan does not seem to have been changed.*	Using of appropriate planning wording is key to its implementation.	As outlined in the Consultation Statement, add ' <i>preserve and enhance</i> ' to the 4 th bullet point.
p28, 2 nd para	There are only sixteen policies in the plan.	Minor error.	Amend '17' to '16'
p30, Policy JNP1, Design & Materials	This policy needs to recognise the connection between the SUE and Thetford urban area. It still does not provide full recognition of the range of housing types, for example flats, some of which will not have rear gardens. Any policy that applies to the SUE should build upon existing policies in the Thetford Area Action Plan. The supporting text for the policy (page 31/32) justifies the approach to design in the wider parish, but does not provide justification for the policy to apply to the SUE.*	The Neighbourhood Plan needs to recognise the significance of the SUE and its purpose as a sustainable urban extension to Thetford.	Reconsider creating separate design policies for the SUE from the rest of the parish. <i>Also see amendments below.</i>
	We welcome the fact that the old 1 st & 2 nd have been combined to form a new 1 st para, but this still duplicates the new 3 rd para (old 4 th).	Duplication of wording remains.	Combine 1 st & 3 rd paras.
1 st para	The first paragraph of Policy JNP1 refers to the 'relevant settlement'. It is not clear how a decision taker would know which the relevant settlement to apply this policy to is.	The NPPF Core Planning Principles: " <i>[plans] should provide a practical framework within which decisions on planning applications can be made with a high degree of</i>	It is recommended to define what is meant be relevant settlement, or amend wording to the " <i>nearest adjacent settlement</i> ".

		<i>predictability and efficiency”</i> (NPPF, para 17, 1 st bullet point)	
Criteria a) & b)	Criteria a) and b) of the policy are considered too onerous and do not take into account viability and are not applicable to all types of dwellings. For example, a separate rear access and requiring rear garden to equal ground floor footprint will increase cost and could damage deliverability where a scheme has marginal viability.*	The criteria as drafted are not currently adequately justified in the supporting text or further evidence. As drafted, this will be difficult for officers to apply.	It is recommended to remove bullet points a) and b) or at least omit for certain classes of home i.e. mid-terrace, where access is likely to cause the greatest problem. Also if a) is retained amend as follows: “... of new residents, rear gardens. Total amenity space should be at least equal... ”.
p33, Policy JPN2, Housing density, 1 st para	The policy refers to the existing prevailing density (as identified in the Character Appraisal); however the Character Appraisal does not currently appear to contain specific information/data on housing density therefore it is not clear how the policy would be implemented. Furthermore the Character Appraisal does not currently contain a section on Thetford therefore it is not clear how the policy applies to the SUE. The density for the SUE will be informed by the TAAP, the parameter and density plans in the planning permission and the amount of land available.*	To aid implementation of the policy - this policy should not be an area wide policy as the Character Appraisal does not contain information on Thetford. Therefore, it should not be used to inform the density of the SUE.	The policy or supporting text should list the density information referred to in the policy, or should make specific reference to the part, or parts, of the Character Appraisal which record densities.
3 rd para	We welcome the inclusion of maps and some photographs showing the village gateways. The policy or supporting text would benefit from reference to the specific maps (title, page number) for interpretation.	This will aid implementation of the policy by enabling the reader to clearly identify the maps to which the policy relates.	Reference to the specific maps within the policy or supporting text (title, page number) for interpretation. Also on these maps the legend identifying the gateway is missing and needs adding - see comments re p74, 76, 78 & 80, ‘b’ Maps.
p38, Policy JNP4: Integrating the Sustainable Urban Extension (SUE)	This policy does not recognise the connection between the SUE and Thetford town, and is repetitive when combined with policy JPN1 & 2. The policy has been amended since the Reg. 14 consultation with	Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE, and its	Consider revising policy to create a design policy for the SUE which reflects the principle role of the SUE as an urban extension to

	<p>the addition of the second paragraph relating to Thetford. The policy seeks for the SUE to be designed to reflect the character, form, style and materials of the relevant parish, as identified in the relevant character appraisal.</p> <p>As the SUE is spread across the two parishes of Croxton and Kilverstone and is immediately adjacent to Thetford, it is uncertain how this could be implemented to form a comprehensive development proposal. The policy as currently worded, presents an unclear approach to design, which does not reflect the adopted Thetford Area Action Plan (TAAP) or the outline planning permission and proposed phasing. However, the wording of the last two paragraphs (page 49) is supported and could be incorporated into a revised policy for the SUE.*</p>	<p>purpose as a sustainable urban extension to Thetford.</p> <p>The NPPF Core Planning Principles: <i>"[plans] should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency"</i> (NPPF, para 17, 1st bullet point)</p>	<p>Thetford in addition to the relationship with the rest of the parish and incorporates the detail on mixed communities, inclusive design and community consultation.</p>
1 st para	<p>The SUE should be designed to reflect the character etc of Thetford, as opposed to more distant rural settlements. Reflecting the latter will also have viability issues, which do not appear to have been addressed. (See initial comments re Policy JNP1ra). The planning permission imposes conditions that require the submission of design briefs per phase that accord with the Design and Access statement for the scheme.*</p>	<p>The design and viability are key to the SUE schemes implementation.</p>	<p>Amend end of sentence to read '<i>...and materials of the parish as identified in the relevant Character Appraisal Thetford.</i></p>
3 rd para	<p>It is not clear what is meant by '<i>urban-style elements</i>'. Certain parts of the SUE may better reflect a more urban character, some a more rural character. This would help break up the SUE and create different character areas.</p>	<p>The NPPF specifically seeks to avoid imposing architectural styles or particular tastes (para 60, NPPF).</p>	<p>Amend to "<i>... and where possible urban-style elements should be discouraged appropriate development of urban character should occur closer to the town</i>".</p>
p40, Policy JNP 5, Historic Environment and Character, 1 st para	<p>We welcome the identification of non-designated heritage assets.</p>		
2 nd para	<p>Requiring a Heritage statement on all development proposals adjacent to CA's would be onerous on very small scale developments.</p>	<p>The proposed approach goes beyond what is required statutorily and within local and national planning policy. This should be</p>	<p>It is recommended to either delete or add in thresholds to the policy. Development proposals should have regard to non-designated</p>

		adequately covered by emerging Local Plan policies ENV 07 Designated Heritage Assets and ENV 08 Non-Designated Heritage Assets in the emerging Local Plan.	assets, but a statement should not be a mandatory requirement.
p42 Policy JNP6, Natural Environment	This is a new policy, not included at Reg 14.stage. The first paragraph summarises the requirements of the Habitats Regulations, which is technically not necessary.	This duplicates the regulations.	Suggest moving 1 st para into the text.
2 nd para	This approach risks the retention of low value trees and hedgerows which should not necessarily be seen as a constraint upon development.*	To avoid misplaced retention of low value trees and hedgerows.	Amend- <i>‘Where possible, existing natural features such as trees of high and moderate quality with identifiable arboricultural, landscape or cultural values as well as important hedgerows, should be retained...’.</i>
3 rd para	If a feature contributes to character of an area then they should be retained or replaced/enhanced within the application site, not outside it. Also this part of the policy is too onerous, in relation to the requirement to achieve a net gain in biodiversity.*	The policy appears to go beyond what is required statutorily and within local and national planning policy.	It is recommended to delete the first sentence until it starts <i>“Development overall should seek to achieve a net gain in biodiversity...”</i> .
6 th para	All development will add to increased traffic flows and to require all development proposals to produce transport statements is considered unnecessary.*	The proposed approach is considered onerous on very small scale development to require a Statement, and should be more specific.	It is recommended to add in thresholds to the policy for clarity. If there are already specific routes which have problems, identify them, and how issues prevented.
7 th para, 1 st sentence	It is unclear whether this fits with GI strategy for protected sites. Usually the objective is to increase <i>‘managed public access’</i> . Although the response in the Consultation Statement has agreed with is amendment, the plan does not seem to have been changed in this regard.*	To ensure the appropriate implementation approach is taken.	Replace <i>‘avoid’</i> with ‘managed’ as per the response in the consultation statement.
Policy JNP8, Community Facilities, Existing	The policy on existing facilities is very similar to Core Strategy policy COM 4 in Breckland’s adopted Development Plan which is being taken forward as policy DC18 in the emerging Breckland	The Neighbourhood Plan should not duplicate policies in the adopted and emerging	Delete criteria a), b) and c).

facilities, 1 st para; criteria a), b) and c).	Local Plan.*	development plan.	
New Facilities	It is suggested that this policy has more detail and specifics e.g. when these are required. Policy should make clear what needs to be put towards and where.*	Needs to meet the Planning Obligation tests (Para 204, NPPF).	Add in thresholds for securing obligations; refer to more detailed/ considered list of new projects to be put towards; or if no detail updated project list to include these will be appended, and monitored every 6 months/ year / 2 years etc.
1 st para	Development cannot be required to improve; it can only be required to mitigate for its impact. Improvements and planning gain are at the gift of the applicants.*	Need to ensure this meets the Planning Obligation tests (Para 204, NPPF).	Suggest rewording to reflect The Planning Obligation tests.
2 nd para	Parish Councils are already consulted on all planning applications. The PC's can set out their priorities for the use of developer contributions in any consultation response and through updating the JNP. Although the response in the Consultation Statement has agreed with is amendment, the plan does not seem to have been changed.*	Criterion is not strictly needed, and should be an ongoing objective.	Either delete or reword this criterion so where there are funds/contributions these shall be directed towards those priorities set out in the NP, or otherwise required by policies in the Local Plan.
3 rd para	It is suggested that this is about the SUE and this should be contained within a SUE policy.*	To aid implementation of the scheme.	Add to an amended SUE policy.
p49, Policy JPN9, Employment	It is suggested that this policy requires further detail. It is unclear how existing employment sites will be protected. Are there exceptions to this protection e.g. where the employment use is no longer viable or is not compatible with surrounding uses. It is unclear how this fits with permitted development rights for conversion to residential. The policy does not specify what kinds of employment uses are inappropriate in the rural area. The policy should define employment sites that the policy is seeking to protect (as opposed to in the supporting text) and outline these on a map for clarity.*	In order to ensure the policy is effective, consideration of the implementation of the policy is required.	Provide further detail in the policy wording. Consider outlining exceptions and defining employment sites in the policy.

p49, para 4.42	<p>We suggest mentioning the circa. 50 acres of employment land which forms part of the SUE in the justification.</p> <p>Also, although outside of the joint neighbourhood boundaries, mention should be made of the Thetford Enterprise Park employment site which is adjacent to the western boundary of the SUE. Both employment sites have the potential to provide significant local employment for SUE residents and people living in the existing parish settlements.</p> <p>Although the response in the Consultation Statement has agreed with is amendment, the plan does not seem to have been changed.*</p>	The development of 5,000 homes into the SUE will increase the demand for local employment, especially if the SUE is not to become purely a commuter based settlement.	Add the suggested text in section on page 16/17 regarding Croxton.
p50 Policy 10 Surface Water Drainage & Flooding	<p>This is a new policy, not previously included at Reg.14 consultation stage. The policy requires an appropriate assessment for all development regardless of scale, use or susceptibility to flood risk which is not justified. The policy largely repeats national and local policy and is currently addressed by adopted Core Strategy DC 13 and emerging local plan policy ENV 09.</p>	The policy goes beyond what is required statutorily and within local and national planning policy. It repeats national and local policies.	The policy is not strictly necessary and the issue is covered elsewhere in the Development Plan.
p52, Policy 11 Avoiding the coalescence of Settlements	<p>It is suggested that further supporting text setting out this level of protection for these specific areas is justified is introduced. The nearby SUE addresses the growth for Thetford, so there is no significant additional pressure in this area.</p> <p>This issue was raised and dismissed by an examiner for the Yaxham Neighbourhood Plan within Breckland District. It would be useful to consider this Examiners Report to understand the issues with this approach, or provide further reasoning and detailed area appraisals for the gaps to justify the proposed policy approach.</p> <p>While the supporting text has been amended to provide further justification for the policy, neither the supporting text, or Character Appraisal adequately justify why the landscape in Area 1 and Area 2 warrants additional protection, above and beyond that set out in national and local planning policy e.g. identify what</p>	NPPF discourages protecting large swathes of land. The justification for these sites needs strengthening as both qualitative and quantitative data is required, not just the former e.g. still no reference to the local Landscape Character assessment. Also see Yaxham & Mattishall Examiner's Report.	Provide further reasoning and detailed area appraisals for the ' <i>identified protected areas</i> ' to justify the proposed policy approach, or modify the at least the larger of the two ' <i>areas</i> '.

	exactly is 'special' about the area shown; which could be difficult as part runs adjacent to the A11.*		
d)	Permitted development will allow some forms of development that doesn't require policy to guide development.*	Need to clarify the situation in regards to developments that would not require planning permission.	Amend <i>"To prevent coalescence of settlements within the areas, where planning permission is required, approval will only be given for the construction of..."</i> .
p55, Map 6	Currently there is no reference in the key or on the map which are 'identified protected areas'. Although the response in the Consultation Statement has agreed with this amendment, the plan does not seem to have been changed.	Need to clarify the mapping situation.	As outlined in the Consultation Statement, make clear on the map which 'identified protected areas' is Area 1 & which is Area 2.
p59, Policy JNP13 Greens, Open Spaces and Undeveloped areas	This is a new policy, not included at Reg.14 stage. Whilst the policy references the maps, it would be beneficial for the policy or supporting text to set out the specific map reference for each of the proposed Local Green Spaces.	Aiding implementation by ensuring the decision taker is clear on which areas the policy applies to.	Set out the specific map reference for each of the proposed Local Green Spaces.
p73 & 77, Maps 7 - 11b	The maps linked to the policies attempt to show character areas. The character areas appear to apply to an entire parish, although this is not made clear in the supporting policy text, and the maps don't always show the whole area. It is questionable whether a 'character area' can be defined as an entire parish and, whilst the character appraisal provides extensive detail on each parish, the supporting text could summarise this point to provide clarity to the reader.*	Aid implementation of the Neighbourhood Plan policy.	Define areas the policy applies to, to ensure a policy and supporting text makes clear the justification for the character areas. The maps should show the full extent of the character area, which is missing from maps 8a & 10a. N.B. Also need to be consistent in labelling: on Map 7a reference is made to 'Croxtton character area', whereas on Map 8a, 9a, 10a & 11a this is referred to as 'Area surveyed'.
p74, 76, 78 & 80, Maps 'b'	We welcome the inclusion of these maps, despite the omitted elements. This makes it difficult to understand where the assets listed in Policy JNP12 - 16 are.	Aid implementation of the Neighbourhood Plan.	The legend is missing from Map 8b, 9b, 10b & 11b, as well as a scale rule. Also asset labels are missing from Map 7b.

p73 & 77, Maps 8a & 10a	These maps still need to show where the boundaries of the character areas are.	Aid implementation of the Neighbourhood Plan.	Enlarge the scale of the maps to show where the boundaries of the whole character areas are.
p81-86	Welcome the new inclusion of Appendixes B-C.		
p84-86 Appendix C Glossary	While we welcome the inclusion of a glossary, there are a number of amendments that the Council recommends to aid implementation. The following definitions do not appear in the main body of the plan and most appear to have been written for Local Plans rather Neighbourhood Plans.		
	Brownfield Land or site; Duty to Co-operate; EIA; Local Development Framework; Local Nature Reserve; material consideration; mixed use; planning condition; protected species; site of special scientific interest; sustainable development; sustainable development & tree preservation order.	They are not referred to within the main body of this Neighbourhood Plan.	Delete references.
	<i>The following descriptions have been omitted:</i>		
	Basic Conditions	A requirement of Neighbourhood Planning.	<i>“These are the considerations that an Independent Examiner needs to take account of when examining a Neighbourhood Plan. These include: having regard to national policy, contributing to attaining sustainable development, conforms to the strategic policies in development plan, compatible with EU obligations, and meeting other legislation & regulations”.</i>
	‘Making’ of Neighbourhood Plan	A stage of Neighbourhood Plan preparation.	<i>“When a Neighbourhood Plan is signed off – the same as a Local Plan being ‘adopted’”.</i>
	<i>The following descriptions need rewording in relation to Neighbourhood Planning:</i>		
	General Conformity	A Neighbourhood Plan should conform to the Strategic policies in	Reword “A Neighbourhood Plan should be in ‘general conformity’

		a Local Plan and have 'regard to national policies and advice' which is not the same as aligning with.	<i>with the (Breckland) Local Plans strategic policies".</i>
	National Planning Policy Framework	The description relates to a Local Plan rather than Neighbourhood Plan.	<i>Amend "The NNPF forms the national planning policies that a Parish Council should take account of when preparing a Neighbourhood Plan".</i>
p88-90	Appendixes F are more appropriately located in the Consultation Statement.		