

Swaffham Neighbourhood Plan

Submission Plan for Regulation 16 Consultation

Representations on Neighbourhood Plan

Ref	Received	Organisation / Name	Page and Policy / Paragraph No	Comments	Amendments
01/01	29/11/18	Sports England	Standard response regarding policy sources	No specific comments	
02/01	29/11/18	Anglian Water	p41, Policy ENV2 Climate change	Anglian Water is supportive of Policy ENV2, as it states that grey water will be used where possible. The Anglian Water company area has been classified as an area of 'serious water stress' by the Environment Agency, and so we welcome actions such as this to make water use more sustainable	
02/02			p42, Policy ENV3 Localised flooding areas	<p>Anglian Water is supportive of Policy ENV3, as it states that development should prevent and alleviate localised flooding, and that new developments must not cause or contribute to flooding, drainage issues, or water pollution. Furthermore, Anglian Water is in support of the incorporation of Sustainable Drainage Systems (SuDS) in all developments within the Parish. This is consistent with the surface water hierarchy and would help to ensure that new developments do not increase the risk of surface water or sewer flooding.</p> <p>Anglian Water has since 2012 been adopting and maintaining SuDS features which are located in a public open space as part of new developments where we have been approached by a developer and it met the standards as outlined in our Sustainable Drainage systems adoption Manual.</p> <p>Sewers for Adoption Version 8 is due to be published in</p>	

				<p>Mid 2019 and will for the first time include guidance on SuDs that can be adopted as sewers by sewerage companies including Anglian Water.</p> <p>A new document is available on the Water UK website that explains the changes that have been made to Sewers for Adoption related to surface water sewers. The new document together with the new Sewers for Adoption (pre-implementation version), can be found on the following address: https://www.water.org.uk/policy/improving-resilience/sustainable-drainage-systems</p>	
03/01	02/12/18	Don Hoey	p20, HBE1: Location of development	<p>The Policy states, “Any new development should take account of the potential for a north/south relief road (see TRA2).” TRA2 makes no mention of the potential for a north /south relief road. Additionally no assessment of such a potential route for a north/south relief road has been undertaken by Norfolk Highways. Therefore how can new developments take account of the potential of such a relief road?</p>	<p>Remove the sentence: <i>Any new development should take account of the potential for a north/south relief road (see TRA2)</i></p>
03/02			p20 Policy HBE1 (Also see comments on Consultation Statement on p191 & p211 below)	<p>“Development should be distributed to the east and west of the town,” The supporting text makes no reference to the development constraint to the west of the town and south of the Lynn Road and A47, namely the GPSS/CLH-PS aviation fuel pipeline.</p> <p>At the Regulation 14 public consultation on 18th of July 2018, in conversation with Councillor Paul Darby of the Steering Group, it appeared that the pipeline run west of Swaffham was not known. Similarly so for any regulations that might be applicable to any expressed preference of development to the west of town as detailed in draft Policy HBE1. This was all rather suprising as I had raised the same issue at the Neighbourhood Plan South of Town Workshop in July 2017, where he, as a Streering Group</p>	

				<p>member, was an active participant.</p> <p>My comments resulting from the Regulation 14 consultation are detailed on pages 191 to 211 of the Consultation Statement. The submitted PDF version includes rough maps indicating the pipeline route through Swaffham CP. This was followed up as a result of events, by a further pipeline specific comment submitted within the consultation period, and that is detailed on pages 211 and 212 of the Consultation Statement.</p> <p>The Consultation Statement indicates a rather pick-and-mix response from the Steering Group, none of which appear to relate to, or show consideration of, either NPPF, COMAH Regulations 2015, Planning Practice Guidance - Hazardous Substances, or prior consultation or advice sought from Breckland Planning.</p>	
03/03			p38, para 6.3.1 & 6.3.2 Environment and landscape	<p>As noted by NCC there is no Biodiversity Policy, and although the Breckland SPA is referred to in general terms as The Brecks, no reference is made to the Breckland Forest SSSI, elements of both of which are within Swaffham CP the designated Neighbourhood Plan area. Resulting from NCC comments at Reg14, Country Wildlife Sites are now identified by reference, and descriptive location. These were all shown on maps (page 30) in the SA Scoping Report v2 May 2018, but those maps have not been added to the latest draft NP.</p>	For clarity of actual locations, add the maps from the SA Scoping Report v2 May 2018
03/04			p42, ENV3 Localised flooding areas	<p>Referring to Sustainable drainage systems, the Policy states <i>"Such systems must not be used as, or contribute to, the requirements for public open space or play areas."</i></p> <p>This I believe would have a negative impact on the viability of, in particular small sites such as Days Field, that the Town Council is considering developing, as it negates the possibility of multi-use where below ground surface water attenuation is the developers choice. Such a policy applied</p>	Remove the sentence. <i>Such systems must not be used as, or contribute to, the requirements for public open space or play areas.</i>

				to that site for example, could result in the loss of up to two dwellings from the current outline permission for 51 dwellings. Reference 3PL/2014/1355/0	
03/05			p53, BUS4 Town centre retail	The Policy states, “Where it can be demonstrated that a town centre premises is no longer required for retail use, first preference will be for a leisure or community re- use on the ground floor.” There is no indication of what criteria might be applied, and the sentence runs contrary to the more positive text within 6.4.17, Policy BUS5, and all that Breckland Council is actively doing to promote the vitality of market town centres.	Remove the sentence. <i>Where it can be demonstrated that a town centre premises is no longer required for retail use, first preference will be for a leisure or community re- use on the ground floor.</i>
04/01	11/12/18	Wood PLC on behalf of National Grid	General comment	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 and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.	
05/01	12/12/18	Historic England	General comment	We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout. Aside from congratulating those involved, we do not wish to provide detailed comments at this time.	
06/01	31/12/18	Highways England		We have no comments to make on the policies set out in the document.	
	07/01/19	Norwich County Council:			
07/01		Historic Environment Team	p18, para 6.1	It is suggested that the Plan contains the following statement as supporting text under 6.1 Housing and the built environment:	<i>‘The Historic Environment Strategy and Advice Team will continue to provide advice on the historic environment aspects of new developments upon request’.</i>

07/02		Norfolk Fire and Rescue Team	p30, HBE7: Community Safety	<p>This policy only makes reference to crime reducing measures. As each proposed site is an extension to the town at the extremities to the current housing stock and is therefore further away from the existing fire station it would be helpful if domestic sprinklers and improved automatic detection was set as a benchmark for future housing developments in Swaffham. Fire engineered solutions for domestic dwellings save lives and as Swaffham has an older than average population (pg.7 2.4) it would be good to see the plan make for provision for their safety by being pro-active in house design. Also, by making provision for all new developments in their current suggested locations, this will have a knock on effect (in time) of responding fire crews. Swaffham is a purely on-call staffed station, meaning that crews have to respond from their homes during social and leisure time. As new members are employed, this new housing stock may provide willing applicants but as they are all going to be living further away in a busier town, the response time for crews to mobilise will increase. This will have implications for the safety of the community. The town plan could / should look to release land for the option of a new location of the current fire station to a more suitable site.</p>	
07/03		Norfolk Fire and Rescue team	p32, TRA1: Traffic Volume	<p>This policy states that <i>“Measures will be supported to reduce traffic volume through Swaffham Town Centre and the associated air pollution”</i>, whilst the reduction of traffic is supported. But measured of traffic volume reduction have a direct and immediate effect on the response times of fire appliance crews. Pg.34</p>	
07/04		Lead Local Flood Authority (LLFA)	p 41-42, ENV3: Localised flooding areas and Paragraph 6.3.8,	<p>The LLFA welcomes the inclusion of the specific policy (<i>and text</i>).</p>	

07/05		Norfolk Property Service Team	p47, ENV6: Designated Local Green Space	This policy should be revised to remove reference to the protection of School/Academy playing fields (no's. 12-15) as designated Local Green Space as this is in contrast to policy COM5, page 62, which supports school expansion. This effectively exempts the playing fields from Local Green Space protection and therefore their inclusion is considered unnecessary. Additionally, this protection would also cause unnecessary barriers during the planning and development stage of school expansions, which is already supported by COM5.	
07/06		Norfolk Fire and Rescue Team	p49, 6.4. Business and employment	The proposed development of employment allocation land, shown in figure 20, areas SW2 and SW3, is supported as it has the possibility of providing a catchment area of employed persons to join the on-call team that would be of benefit to the local on-call crew, but the access to 'West Acre Road' and the present fire station needs to be considered, otherwise the same situation of increased response times will be an issue.	
08/01	09/01/19	Environment Agency	p42, Policy ENV3: Localised flooding areas - advisory comments with respect to groundwater protection	Draft policy ENV3 makes reference to the use of sustainable drainage systems. We have no objection to the use of sustainable drainage systems but wish to offer the following guidance for information only. Swaffham is underlain by a principal aquifer and is also located within a groundwater Source Protection Zone (SPZ – predominantly zone 3). Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage; they support water supply and river base flow on a strategic scale. SPZ are defined around large and public potable groundwater abstraction sites. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of activity that may impact upon a drinking water abstraction.	

			<p>Given the sensitivity of the water environment at this location we offer the following guidance with respect to sustainable drainage systems:</p> <ul style="list-style-type: none"> • Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment. • Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. • Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters. • The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. • Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). • SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753, 2015) and the Susdrain website. • For further information on our requirements with regard to SuDS see our groundwater protection position statements, in particular Position Statements G1 and G9 	
--	--	--	---	--

				<p>to G13 available on our website.</p> <ul style="list-style-type: none"> • ‘The Environment Agency’s approach to groundwater protection’, sets out our position for a wide range of activities and developments, including SuDS. • ‘Guiding Principles for Land Contamination’ which outlines the approach which should be adopted when managing the risk posed to the water environment by development sites. • Refer to the contaminated land pages on GOV.UK for more information. 	
09/01	21/01.19	Messrs Heygate Farms Ltd,	p47, Policy ENV6	<p>Whilst the Antinghams and Manor House Grounds appear to have been removed from the list of Designated Local Green Space in Policy ENV6 (Page 467), the Manor House Grounds remain included in Appendix H (Page 98) (“Justification for Local Green Spaces”).</p> <p>Whilst the inclusion of Manor House Grounds in “Justification for Local Green Spaces” appears to be as a result of a proofing error, for the sake of clarity, I would confirm that the inclusion thereof is objected to by my clients.</p>	Remove Manor House Grounds from Appendix H (Justification for Local Green Spaces).
10/01	25/01/19	Breckland Council		<i>See attached Decision Report and Decision Report Appendix</i>	

Representations on Consultation Statement

Ref	Received	Organisation / Name	Page and Policy / Paragraph No	Comments	Amendments
03/06	02/12/18	Don Hoey	Page 191 – <i>“Route of the existing pipeline is well known and established. Any proposals for use of land for development that will be on or near the pipeline will covered by planning policy and building regulations.”</i>	In this instance Building Regulations are not applicable, as they are not concerned with appropriate development, appearance of neighbourhoods, or the nature of land use.	N/A
03/07			Page 211 – <i>“No change, major hazard pipeline issue beyond the scope of the Neighbourhood Plan”</i>	In view of the close proximity of the CLH-PS pipeline to the south west of the Swaffham settlement boundary, and the inherent complexity in any decisions regarding future distribution of development particularly to the west of town, I defer to Breckland Council, and the Neighbourhood Plan Examiner’s view on the matter.	N/A