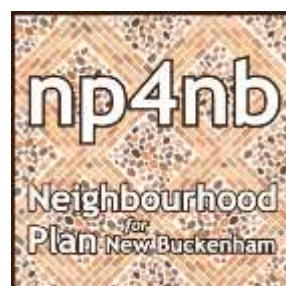




New Buckenham Parish Council
New Buckenham Neighbourhood Plan
2017-36

Consultation Statement



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1. INTRODUCTION

- 1.1.1. This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.1.2. Section 15(2) of Part 5 of the Regulations sets out what a consultation statement should contain:
- Details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
 - Explains how they were consulted;
 - Summarises the main issues and concerns that were raised by the persons consulted;
 - Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.
- 1.1.3. This consultation statement will also demonstrate that the process undertaken to produce the New Buckenham Neighbourhood Development Plan has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a Neighbourhood Development Plan to the Local Planning Authority (in this case Breckland District Council) a qualifying body (in this case New Buckenham Parish Council) must:
- Publicise it in a manner that is likely to bring it to the attention of people who live or work within New Buckenham,
 - Provide details of the proposals within the Neighbourhood Development Plan;
 - Provide details of where, how and when the proposals within the Plan can be inspected;
 - Set out how representations may be made; and
 - Set out the date for when those representations must be received, being not less than 6 weeks from the date from when the draft proposals are first publicised;
 - Consult any consultation body referred to in Para 1 of Schedule 1 whose interests the qualifying body may be affected by the proposals for a neighbourhood development plan;
 - Send a copy of the neighbourhood development plan to the Local Planning Authority.
- 1.1.4. Furthermore, the Planning Practice Guidance at paragraph 15 requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan and ensure that the wider community is kept fully informed of what is being proposed, can make their views known throughout the process, has opportunities to be actively involved in shaping the emerging Neighbourhood Plan and is made aware of how their views have informed the draft Neighbourhood Plan.
- 1.1.5. The policies contained in the New Buckenham Neighbourhood Plan (hereinafter called “the Plan”) are as a result of considerable interaction and consultation with the community and with businesses within the Parish of New Buckenham. Work has involved community groups over approximately three years, as well as surveys, public meetings and events. This has been overseen and co-ordinated by the Neighbourhood Plan working party which was appointed by the Parish Council to lead the project. Views and interactions from this process led to the Objectives set

out in Section 1.6 of the Plan, and therefore form the basis for the key policies outlined in Section 2 of the Plan.

2. CONTEXT FOR THIS NEIGHBOURHOOD PLAN

2.1.1. In 2014/15 there had been much discussion in the village, and within the Parish Council, about the need for new housing. A housing needs survey had been undertaken by Breckland Council in 2014, and the outcomes were taken up by The New Buckenham Society¹ at a public meeting in the Village Hall on 19 March 2016, facilitated by Timothy O’Riordan, FBA, Emeritus Professor of Environmental Sciences. A key question under consideration was: how were we to reconcile the inevitability of change with the preservation of our historic and unique village? Following this event an article reflecting on the issues raised appeared in the village’s Parish News² the next month. In May 2016, a letter was sent to the Parish Council from the New Buckenham Society urging the Council to look into the feasibility of undertaking a Neighbourhood Plan.



Figure 1 Open meeting poster, 2016

2.1.2. Informal discussions amongst village residents continued throughout the spring and summer of 2016 and the Parish Council endorsed the proposal to undertake a Neighbourhood Plan at their meeting on 12 July 2016. An article co-authored by the Chair of the Parish Council and the Working Party appeared in the August edition of Parish News (Figure 2). Entitled ‘Planning our village’s future’, the article announced the appointment of a working party to investigate the feasibility of undertaking such a project and encouraged residents to get involved.



Figure 2 Parish News announcement, August 2016

¹ The [New Buckenham Society](#), founded in 1993

² *Parish News* is a monthly publication delivered to every household in New Buckenham and distributed to adjacent parishes and businesses.

- 2.1.3. Members of the working party were drawn from some members of the New Buckenham Society, new and long-term village residents, and three Parish Councillors one of whom was co-opted to liaise specifically between working party and Parish Council. The Chairman of the Parish Council was appointed an ex-officio member. All were unpaid volunteers who offered their services to the village in order to undertake this important task. Broadly defined, the role of the working party would be to undertake all necessary steps to gather information to inform a Neighbourhood Plan, undertake specialist research with external experts if and when required, and ensure that the community was actively engaged in the process and kept fully informed throughout.
- 2.1.4. During September, October, November and December 2016 a series of reports and draft documents were presented to the Parish Council. In their deliberations the Parish Council considered the status and governance of the working party and requirements for financial reporting. Councillors also raised concerns about the role of the Plan in identifying sites within the village for future housing development. Representatives from the working party and Parish Councillors met with Susan Heinrich, Breckland District Council Neighbourhood Plan Co-ordinator, on 13 October 2016 to seek guidance on this issue.
- 2.1.5. In December 2016 the working party presented the [Terms of Reference](#), [Communications Strategy](#) and project plan to the Parish Council and reported on negotiations with Old Buckenham Parish Council about the designated area (which it was proposed should extend across the parish boundary into Old Buckenham so as to include the Castle, ancient monument and grounds). The Parish Council agreed that the Statement of Intent should be submitted to Breckland Council. Henceforward the Neighbourhood Plan would appear as a regular item on the Council meeting agenda.

3. PUBLICITY AND COMMUNICATION

- 3.1.1. It would be accurate to describe New Buckenham as a close-knit community. Modest in size and compact in geography, it is a community that is well used to working together to achieve joint goals.
- 3.1.2. There were some initial concerns about the purpose of the project:
- An expectation that the Neighbourhood Development Plan would solely focus on housing issues, and
 - Surprise and some reluctance to embark on a Plan – The village is ‘perfect’ as it is.
- 3.1.3. Thus it was essential to seek a consensus on the aim of the project and to win community support for the task ahead. Publicity for events and reports on progress were relayed in a number of ways as illustrated throughout this Statement: leaflets through letter boxes; notices and articles in the monthly Parish News; information via The [Neighbourhood Plan’s dedicated website](#) and its associated [Neighbourhood Plan Facebook page](#), the latter sharing its items with the [village Facebook page](#).
- 3.1.4. Posters were displayed around the village and in the shop and considerable efforts were made via personal networks and word of mouth. A Communications log is in Figure 3.
- 3.1.5. New Buckenham’s Parish News has a hard-copy print run of 270 and a copy is distributed, monthly and free of charge, to each household in the village. Copies are available in the shop, King’s Stores, and a digital version can be read online at [the village's website](#).
- 3.1.6. A widely-advertised email address (info@np4nb.online) was set up and used as a conduit for receiving comments during the Pre-submission stage.
- 3.1.7. A newsletter for businesses (Biz Buzz) was independently started by a Working Party member and continues to this day, emailed to businesses and posted online and in Parish News. Apart from business topics, more than 100 alerts specifically about the coronavirus crisis have been issued.

3.2. Communications log

	Topic	NP Website	Parish News	NP Facebook	Flyers & Posters
Dec 2019	Consultation launch Open Day	✓	✓	✓	✓
To date	Frequent posts about Coronavirus and business	✓	✓	✓	
June 2020	Further reminder of broadband draft policy			✓	
June 2020	Reminder to send in Consultation comments			✓	
Feb 2020	Reminder to send in Consultation comments			✓	
Oct 2019	No mobile reception and online banking	✓		✓	
July 2019	Reminder of broadband draft policy			✓	
July 2019	Mention of NP draft report			✓	

July 2019	NP mapping	✓		✓	
June 2019			✓		
May 2019	Speeding in the village		✓		
April 2019	Brief report of PC/Team workshop		✓		
2019	Speeding in New Buckenham discussion			✓	
Mar 2019	Brief report of meeting with Highways officer			✓	
Jan 2019	Possible traffic survey			✓	
Nov 2018	Publication of business survey	✓	✓	✓	
Nov 2018	Report of meeting with architect		✓	✓	
Oct 2018	Wildlife records to County database			✓	
Oct 2018	BizBuzz meeting report			✓	
Oct 2018	Invitation to Walk and Talk with architect		✓		✓
Sept 2018				✓	
Sept 2018	Local wildlife observation survey closed			✓	
Aug 2018	Invitation to meet ecologist			✓	
Aug 2018	Report of wildlife surveying (for bats)		✓		
Aug 2018	NP stall at village fete			✓	
Aug 2018	Local wildlife observation survey announced				✓
July 2018	Report of visit to Norfolk Record Office	✓		✓	
July 2018	About the 'research phase'	✓		✓	
July 2018	Announcing Norfolk Record Office visit		✓	✓	
April 2018		✓		✓	
April 2018	Report of 'One Year On' event	✓		✓	
April 2018		✓	✓	✓	
April 2018	Biz Buzz started, continues to date			✓	
Mar 2018	Reminder 'One Year On' event			✓	
Mar 2018	Report on Church and Faith focus group		✓	✓	
Mar 2018	Report on Voluntary Orgs focus group		✓		
Feb 2018	Focus groups are coming	✓		✓	
Jan 2018	Call for village businesses to meet			✓	
Jan 2018	About new grant from Locality	✓			
Jan 2018	Announcing 'One Year On' event		✓	✓	✓
Dec 2017	Meeting with planning consultant	✓		✓	
Nov 2017	Survey results in detail	✓		✓	
Oct 2017	Survey - initial results		✓	✓	
Sept 2017		✓	✓	✓	
Sept 2017	Survey ending		✓	✓	
Aug 2017	Survey in process		✓	✓	
July 2017	Survey imminent		✓		✓
April 2017		✓		✓	
April 2017	Report of Launch event				
Mar 2017	NP launch announcement		✓		✓
Jan 2017	Announcing area of NP				
Aug 2016	NP stall at village fete	✓			
Aug 2016	Proposal for NP		✓		
June 2016			✓	✓	✓
June 2016	Great Ditche walk (NBS)		✓	✓	✓
Mar 2016	Public meeting about more housing (NBS)		✓	✓	✓

Figure 3 Communications log

3.3. Timetable 1 – getting started

Date	Activity or Event
2013/14	Breckland District Council Housing Needs Survey
2016	
19 March	Public meeting in the Village Hall facilitated by Professor Timothy O’Riordan, FBA. A key question under consideration was: how were we to reconcile the inevitability of change with the preservation of our historic and unique village?
March	A summary of the meeting discussion was printed in the village newsletter, Parish News. Interested residents meet informally to discuss how the village could build on the discussion generated by the public meeting.
May	A letter sent to the Parish Council from the New Buckenham Society urging the Council to look into the feasibility of undertaking a Neighbourhood Plan. The membership of the Working Party starts to take shape as interested village residents volunteered their services.
12 July	Parish Council endorse the proposal to undertake a Neighbourhood Plan.
August	An article co-authored by the Chair of the Parish Council and the Working Party appeared in the August edition of Parish News. Entitled ‘Planning our village’s future’, the article announced the appointment of a working party to investigate the feasibility of undertaking such a project and encouraged residents to get involved. A stall was set up at the Village Summer Fete by members of the working party in order to publicise the Neighbourhood Plan project. Visitors to the Fair were invited to share their views on a variety of subjects.
Sept-Dec	First drafts of the Terms of Reference for the Working Party and communications strategy were produced by the Working Party and discussed by the Parish Council.
13 October	Parish Councillors and NDP Working Party representatives from the working party met with Susan Heinrich, Breckland District Council Neighbourhood Plan Co-ordinator, on 13 October 2016.
November	Old Buckenham Parish Council approve New Buckenham Plan area proposal to include the Castle, ancient monument and grounds. See minute of 16 November.
December	The Working Party presented the Terms of Reference, Communications Strategy and project plan to the Parish Council and reported on the negotiations with Old Buckenham Parish Council. The Parish Council agreed that the Statement of Intent should be submitted to Breckland Council. Henceforward the Neighbourhood Plan would appear as a regular item on the Council meeting agenda.

2017	
January	Terms of Reference approved by Parish Council at meeting on 10 January.
March	Plan area approved by Breckland District Council; letter dated 30 March 2017.
22 April	Launch of the Neighbourhood Plan at New Buckenham Village Hall.
2016/17	Working Party meets regularly, reporting each month to the Parish Council.

4. OPEN DAYS

4.1. FIRST OPEN DAY- the launch April 2017

4.1.1. The Neighbourhood Plan was officially launched on Saturday 22 April 2017 in the Village Hall. [Posters](#) were displayed in the hall outlining issues and posing questions. About 85 people (approximately one third of the village population) came along to read, listen, learn and argue. Post-it notes were freely available, with spaces to put them next to the posters. [363 comments were posted](#).



Figure 4 Launching the project

"In New Buckenham on that Spring day, the village came up with some clever and innovative ideas – all of which have been noted and are on the website for you to read. Top of the list of things to worry about in New Buckenham was mobile phone and broadband communications. The aspect of the village people liked the most was its heritage and appearance. They also loved the community spirit and the walking and cycling opportunities.

There is anxiety over new building, traffic flow, parking and street lighting. NP4NB will address all of these issues and more. You must tell us what you think at every opportunity. Don't be shy. Nothing is too bizarre for us all to consider. Nor does it matter what age you are – the youngest of children to the oldest young-of-heart residents - all must have their say."

Janet Trewin (member of the Neighbourhood Plan working party).



New Buckenham Parish News

April 2017

Launching the Neighbourhood Plan

One year ago there was a vigorous public meeting in the village hall, chaired by Prof Tim O'Riordan the eminent environmentalist. This was triggered by the possibility of a housing development on open farmland opposite St Martin's Gardens. The debate moved on to wider issues about the village, its heritage, surroundings and quality of life, its good points and its drawbacks. Many people spoke with feeling. There was a sense of frustration that the way New Buckenham will change over the next couple of decades was largely out of the control of village residents.

But now we are doing something about it! As previously mentioned in Parish News, New Buckenham Parish Council is developing a formal neighbourhood plan, and the project will launch in the village hall on Saturday 22 April. Please come at any time. There'll be lots of information about what we're doing, but above all we need you to tell us what you think. Without your help we won't know what you want from your village over the next 20 years. Everyone is welcome, young and old alike, because all your opinions are equally valued.

The launch will be on Saturday 22 April, 10.00am - 4.00pm at the village hall. Admission is free, teas and biscuits will be served.

Charles Oxley

Figure 5 Parish News announcement of project

4.2. SECOND OPEN DAY - “One year on” April 2018

- 4.2.1. On 28 April 2018, the anniversary of the Neighbourhood Plan launch, the working party held an Open Day in the village hall. About 60 people attended the event.
- 4.2.2. [Posters](#) were displayed to summarise the information gathered from the village survey and from the focus groups, and people were invited to comment on the results, pose further questions and make suggestions for future investigations. [The comments are summarised.](#) A map was displayed to prompt comments about footpaths and important views of the village.
- 4.2.3. All the posters for the Open Day One Year On were subsequently displayed on the website.



Figure 6 Visitors to Open Day: One Year On

Neighbourhood Plan: One Year On

Last April, the New Buckenham Neighbourhood Plan project was launched at the Village Hall. Now it's time to find out what's been happening in that first year.

If you've been following our progress you'll know that we are drawing up plans that prepare our community for the demands and changes of the next 20 years. It's a legal document that is lodged with the District Council and influences building, environment, businesses, etc. until 2036. The best thing is that it's you – village residents – who help write it. About a third of the village turned up for the launch last April to offer some 360-degree views and comments about the village. Since then we've done a village-wide survey (getting an astonishing 86% response rate) and been running focus groups and meetings to gather more ideas.

Neighbourhood Plans generally take three or four years so we're moving quickly compared with others. We've had massive interest and we're working hard to put it all together in a draft plan. The village will have the final say whether to accept this plan.

You are warmly invited to the Village Hall on Saturday 28th April, any time between 10am and 4pm, to learn about our progress with the Plan. We will have display boards illustrating the results of the village survey, new information from the recent Focus Group meetings, and a range of maps, photographs and printed materials to bring you fully up to date.

We hope to see you all. Bring your children to see the maps and do some drawing – they might also like to make their own comments because it's their future! Admission is free and light refreshments will be served.

The Neighbourhood Plan Working Party

Figure 7 Parish News announcement of second Open Day

4.3. THIRD OPEN DAY - pre-submission consultation launch December 2019

- 4.3.1. The consultation was launched officially on 21 December 2019 at an open morning at the village hall. [Posters](#) were displayed summarising the pre-submission Plan. Full colour printed copies of the pre-submission Plan were distributed to attendees, one per household. Records were kept of copies distributed and in the subsequent few days all the other households had copies delivered by hand.
- 4.3.2. The open day had been advertised in Parish News, village Facebook page, posters, and a flier was delivered to each household. Festive refreshments were served.



Figure 8 Consultation launch: flier delivered to each household

- 4.3.3. People came and went all morning, probably numbering about 60 in all. The posters were scrutinised and there was much discussion.
- 4.3.4. At all times attendees were urged to give their views; [paper forms](#) were distributed with hard copies of the Plan and publicity was given to the availability of the forms in downloadable format.



Figure 9 At the consultation launch

Article in Parish News December 2019.

The Neighbourhood Plan — At Last!

When was the Neighbourhood Plan started?

In 2016, triggered originally by a public meeting about housing that was held in the Village Hall with Professor Tim O’Riordan.

Why is the Parish Council doing a Plan?

To gather together issues such as housing, environment, heritage and village life and use them to set out policies that will guide the Parish Council's decision making over the 15—20 years. We know the village will change, so we must plan for it within the context of our heritage, surroundings and life.

Who is doing the Plan?

The Parish Council delegated a working party to do it, consisting of parish councillors and other residents.

What's happened so far?

The research has consisted of the major survey of residents' opinion done in 2017 and the commissioning of professional reports. There has been intensive reading of the literature and discussion with official bodies. Everything has now been written up.

When do we get to see the Plan?

The Plan will be launched on 21st December 10am—12 noon in the Village Hall, to which everyone is invited. Please come and see all the posters and read all about the Plan. Members of the working party will be there for discussion. A limited number of paper copies of the Plan will be available, free of charge. The Plan and all its supporting evidence will be online from that day at www.np4nb.online.

Can we comment on the Plan?

Yes! Above all we need your comments because they will be used to inform and improve the Plan. The launch on 21st December sees the start of the formal consultation process which lasts until 14th February. Anyone can comment — residents, statutory authorities, businesses, landowners, utility companies, and indeed any person with an interest.

How do I comment on the Plan?

Please send your comments online to info@np4nb.online, or via our Facebook page facebook.com/np4nb or by leaving a written message at Kings Stores.

We look forward to seeing you on 21st December and we'll be serving hot mince pies!

Neighbourhood Plan working party

Figure 10 Parish News announcement of Consultation open day

5. INFORMATION GATHERING

5.1. Timetable 2: collecting the information

2017	
August/September	Following months of preparation, survey forms distributed to every householder over the age of 18.
Autumn	Survey forms collected and data from the survey recorded on a computer programme and results analysed. See details in para 6.2.
December	Neighbourhood Plan Consultant, Clare Wright, MRTTPI commissioned by Working Party to assist with project.
December	Dr Richard Hoggett, FSA MCIA, commissioned to undertake a Heritage Assessment and Landscape Character Assessment of the Plan Area.
2018	
Jan, Feb, March	Following discussions with Town Planning Consultant, focus group meetings were held on 26 February, 5 March and 24 March 2018.
20 February	First meeting for working party members with David Jacklin, Community and Environmental Services Department, Norfolk County Council.
24 March	Focus group meeting for parents, children and young people was abandoned due to lack of interest and a successful survey done instead.
28 April	Open Day held in village hall to present survey results to the community and seek their views.
28 July	Visit to Norfolk Record Office.
25 September	Ecology survey undertaken by external consultant.
October	Letters sent to landowners (not resident within the designated area) seeking views and comments.
October(check)	Working party members conducted face to face interviews with local businesses.
3 November	Village 'Walk and talk' event with an architect – to discuss housing and the built environment.
2019	
5 February	Traffic consultant, Carol Grimsey from GH Ballard & Associates visits the village to advise working party members on issues raised in SURVEY17 about traffic noise, vibration, speed, HGVs and parking.
22 February	Meeting to discuss virtual reality tourism guide with Breckworld.

28 February	Second meeting with David Jacklin, Community and Environmental Services Department, Norfolk County Council.
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5.2. The village survey – later called "SURVEY17"

- 5.2.1. The Neighbourhood Plan team surveyed village residents for their opinion from August to September 2017, the whole process now referred to as SURVEY17.
- 5.2.2. Constructing the survey took several months. Two important sources of information helped to shape the survey questionnaire: the comments recorded on post-it notes by visitors to the village summer fete in August 2016: See [2016 Fete survey](#), and the comments and suggestions collected at the launch on 22 April 2017: [Launch day comments](#).
- 5.2.3. Great attention was paid to the way the Survey was delivered to households, the way the results were collected and the built-in anonymity (see below).
- 5.2.4. In order to stimulate interest and involvement a prize draw was announced with prizes for winning entries in the age group 16-24, and for those over 25. The draw was conducted by the Parish Council at the November meeting.

Design

- 5.2.5. The [Survey's questionnaire](#) was compiled by the Plan's working party, taking advice from an expert about the phrasing.
- 5.2.6. It was decided at the outset to use an established online facility ('SurveyMonkey') to do the 'number crunching' and, although printed forms were delivered to all eligible residents, there was an opportunity for residents to complete forms online.

Publicity

- 5.2.7. Extensive publicity was given to the survey's process by notices in Parish News, the village Facebook page and the Plan's website. Fliers were delivered to each household before distribution of the survey forms.

Distribution and collection of responses

- 5.2.8. In September and October 2017 volunteers distributed individual paper copies of the survey forms to all residents aged 16 and over, unlike most such surveys which only refer to households. Members of the team personally gave out survey forms at each household and made arrangements to collect them later. They drew attention to the online completion facility. Non-responders were visited at least once each again to collect forms or be assured that the survey had been completed online.
- 5.2.9. Forms that had been completed by hand were transcribed by volunteers onto the SurveyMonkey template, identical to the direct online access form. The volunteers were instructed to transcribe comments *verbatim*.

Confidentiality

5.2.10. Each resident had a unique reference number to prevent duplication. The identity of each person and their reference number was known to a single member of the team who never saw the completed survey forms. This same person received back the reference numbers of the forms that had been completed and was thus able to alert the other members where there had been non-return of survey forms. Similarly, team members who transcribed the paper copies were unaware of the identity of those who completed the survey forms. Therefore complete anonymity was maintained.

Response

5.2.11. The response rate for SURVEY17 was a pleasing **83% of individuals**, compared with other neighbourhood plan survey rates of **20-30% of households**.



Figure 11 Pre-survey flyer and front page of survey form.

5.2.12. A summary of the results was presented to the Parish Council and immediately put on the Plan's website: [SURVEY17 results summary](#)

5.2.13. The full results are in two (large) downloadable documents:

- [Stats and charts](#)
- [Free text answers](#)

5.3. Commissioning professional research

5.3.1. Although the working party was reasonably confident at researching the opinion of New Buckenham's residents it was not qualified to research two key areas, namely the local ecology and the village's heritage. Two reports were therefore formally commissioned:

- The Ecology Consultancy ([Preliminary Ecological Appraisal](#))
- Richard Hoggett Heritage ([Landscape and Heritage Assessment](#)).

5.3.2. These reports were duly received and published on the Neighbourhood Plan's website.

5.4. Focus groups

5.4.1. During January, February and March 2018 the working party concentrated their efforts on drawing out the key issues from the survey with the expectation that these would eventually feed into the Plan's core policies. Thanks to the excellent response from the village survey, a clear set of priority topics had emerged and these now needed to be developed and investigated further. The topics were:

- Heritage and village character
- Landscape
- Village viewscape
- Communications, i.e. phone/broadband
- Traffic
- Housing
- Community
- Tourism
- Business/economy

5.4.2. The working party, with advice from the Town Planning Consultant, undertook to investigate four topics by holding focus groups in the village and these duly took place during February and March 2018.

Village groups and societies

5.4.3. 17 invitations went to the village's clubs and societies and 15 people attended. Unattributed comments were collected on post-it notes throughout the meeting and collated into a set of action points. A full report of the focus group is at para 10.3.2.

Faith and the Church Estate

5.4.4. 29 residents were present and 9 residents sent their apologies and comments for consideration. The meeting commenced with a SWOT assessment so that weaknesses and threats could be reviewed. Common themes emerged from the discussion and a set of detailed action points was drawn up. A full report of the focus group is at para 10.3.1.

5.4.5. Within days of the event a group emerged from those present at the focus group with plans to take forward an initiative called 'Village and Vestry'. This group continues to flourish.



Figure 12 Faith group meeting on a cold evening

Business

- 5.4.6. A Business Forum was held on 26 March 2018. For two weeks beforehand 100 A5 fliers were distributed throughout the village. Retailers and businesses with an on-street presence were spoken to personally and all were given fliers to display and hand out. Posters were placed on the village notice board, telegraph poles and elsewhere in the village hall. A notice was also placed in Old Buckenham Village store. At all three previous focus groups reminders had been given to invite people to come. Encouraging messages and the flier were posted and re-posted on the village Facebook site, the NP4NB Facebook site, the NP4NB website and on the 'Old Buckenham Nextdoor' website covering nine local villages and Attleborough: a total of 860 recipients. The results of a survey done at this meeting are at para 10.6.
- 5.4.7. A total of 18 interested people came to the event. Also attending to advise and help the discussion were the President of the Norfolk Chamber of Commerce, Jonathan Cage, and the Development Adviser, David Sparkes from New Anglia Local Enterprise Partnership.

Young people

- 5.4.8. A focus group was attempted but there was no response. Instead the organiser conducted a survey of young people and their parents to assess their wishes and needs. A full report of the survey is at para 10.3.3.

5.5. Study events

- 5.5.1. It was apparent from early discussions within the working party, and from conversation with villagers, that specialist assistance would be needed to aid the development of policies in key areas, namely housing and architecture, parking and pavements, landscape and heritage, ecology, business and tourism.

Visit to Norfolk Record Office

5.5.2. The first of the study events took place on Friday 20 July 2018 when a visit to the Norfolk Record Office was arranged. The NRO laid on a display of maps and documents relating to the history of New Buckenham and during the two-hour visit there was time for discussion with Record Office staff. The meeting was attended by about a dozen people.

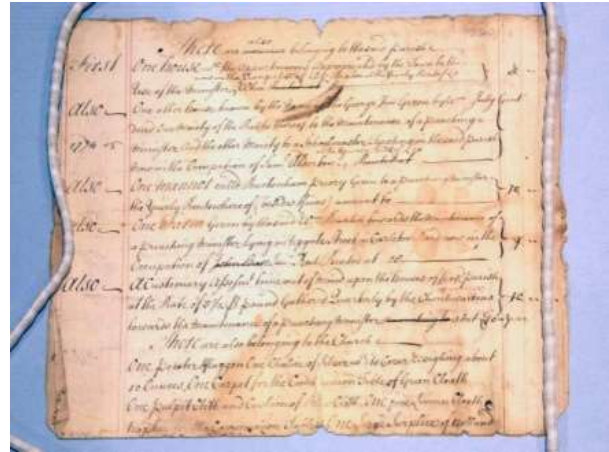


Figure 13 Visit to Norwich Record Office

Ecology

5.5.3. The Working Party commissioned a consultant from The Ecology Consultancy to conduct a [Preliminary Ecological Appraisal](#) of the New Buckenham Plan area and this took place on Tuesday 25 September 2018. The day began with an informal open meeting in the village room to which all were invited to meet the ecologist and to share any information and thoughts with her. About 15 people attended.

During the meeting the ecologist pointed out that there was a paucity of local wildlife records on national and county registers, largely through the lack of formal observation and recording being done. As local knowledge was a useful resource, the Working Party immediately sent out messages by posters and social media inviting personal observations using a simple [questionnaire](#) and using SurveyMonkey for analysis of the answers. Thirty-three households responded and the [results](#) were incorporated in The Ecology Consultancy's report.



Figure 14 Meeting the ecologist and announcing the wildlife survey



Neighbourhood Plan
New Buckenham

**NEW BUCKENHAM
NEIGHBOURHOOD PLAN**

Wildlife Survey

What special wildlife have you seen in and around the village?

Bats, owls, hedgehogs, great crested newts, snakes ? Rare plants ?

We need your local knowledge!

Please visit **np4nb.online**
or collect a form from King's Stores.
It only takes five minutes!

Thanks from the Neighbourhood Plan team

Housing and design

5.5.4. On 3 November 2018 the Working Party invited Ben Woodings BA (Hons) Arch, Grad Dip Arch of Chaplin Farrant to help the community address issues of housing, design style, setting and regulation. The event was open to all and widely publicised through an [article in Parish News](#) and notices displayed in the village. 23 people attended. The morning began with a walk around the village to inspect the location and then the group returned to the village hall so that residents could pose more detailed





Walk and talk with the architect

What do you like?
What don't you like?

Saturday 3rd November at 10am **Village Hall**

Walk around the village then talk

All welcome No charge Coffee Bring camera!



Neighbourhood Plan
New Buckenham



Figure 15 Walk and Talk with the Architect

questions to the architect and discuss some of the issues that arose from the walk. A particular topic of conversation was the possibility of compiling a design guide for the village. A full report of this meeting and discussion is at para 2.5.

Parking and pavements

- 5.5.5. Members of the Working Party met twice with David Jacklin of the Community and Environmental Services Department of Norfolk Council, on [20 February 2018](#) and again on [28 February 2019](#). The meetings took place in the village and were an opportunity to consider issues that had been raised in SURVEY17 about traffic noise, vibration, speed, HGVs and parking. Additionally, the Working Party members invited a traffic consultant, Carol Grimsey from GH Ballard & Associates to the village on 5 February 2019 to look at these issues.

5.6. Survey of landowners

- 5.6.1. Owners of land surrounding the built village were not resident in New Buckenham and were therefore not invited to take part in SURVEY17. Instead landowners were personally invited by letter to take part in a specially designed survey in October 2018. We identified six landowners in the Designated Area, one via a land agent, but the owner of a small field could not be identified. The questionnaire asked questions mainly about the use of their land. All responded and two respondents expressed an interest in housing development. A full report of the survey is at para 10.3.

5.7. Tourism and visitors survey

- 5.7.1. Members of the Working Party conducted over 20 face to face interviews with local businesses to obtain their views on the likely impact of increased numbers of visitors or tourists to the village. Meetings were held with representatives from the local pub, restaurant, private owners of the castle and castle grounds, users of the children's play area, the King's stores, Angel Cakes tea shop, B&B owner, organisers of the Village and Vestry group, and a family business operating in the village. A full report of the survey of businesses and visitors is at para 10.4.

6. WORKING WITH THE PARISH COUNCIL

- 6.1.1. As previously stated in para 2.1.5 the Working Party agreed the [Terms of Reference](#), [Communications Strategy](#) with the Parish Council in December 2016.
- 6.1.2. Following its appointment by the Parish Council, the Working Party met approximately 25 times during 2016-2019 and notes were sent to the Parish Council. Oral reports on progress were also made to the Parish Council at their regular Council meetings. Copies of the agenda and minutes of these meetings are available at [Agendas and Minutes](#) and a précis of each meeting is in Parish News.
- 6.1.3. It soon became clear that there would be insufficient time available to discuss the Plan in any detail at these meetings given the pressure of other business on the agenda. On 22 March 2017 an Extraordinary Meeting of the Parish Council was held to discuss the launch of the Plan and the survey. The meeting was attended by the Parish Councillors and 21 members of the public. See the [Extraordinary meeting minutes](#).
- 6.1.4. On Saturday 23 March 2019 and Monday 24 September 2019 two workshops attended by Parish Councillors and Working Party members were held at the village hall to consider the emerging policies and preparations for the pre-submission document.
- 6.1.5. More than a year later, on Monday 7 December 2020 a virtual workshop between the working party and the Parish Council was held (by Zoom) to consider the draft Submission version of the Plan and approve the preparation for submission.



Figure 16 Pre-launch meeting

7. WORKING WITH BRECKLAND COUNCIL

- 7.1.1. The working party has received invaluable guidance throughout the process from officers at Breckland District Council, particularly from Susan Heinrich, Neighbourhood Planning Co-ordinator. As mentioned in para 2.1.4., an initial meeting was held with Ms Heinrich and Phil Mileham, director of strategic planning policy, on 4 July 2016 to seek preliminary guidance on this issue. Ms Heinrich visited the village to discuss issues and anxieties surrounding such a project on 13 October 2016.
- 7.1.2. On 25 July 2019, representatives from the working party met Ms Heinrich at the Council offices in Dereham to discuss the final steps towards Regulation 14, the pre-submission consultation.
- 7.1.3. Numerous calls and emails have been exchanged throughout the project for general advice and, in its later stages, the revision of draft documents.

8. WORKING WITH CONSULTEES

8.1. At the launch

- 8.1.1. The formal consultation on the Pre-submission Version of the Plan started at the launch on 21 December 2019 and continued for eight weeks until 14 February 2020. The Open Day that launched the consultation is described above in para 5.3. In all publicity it was emphasised that comments were welcome at any stage of the project. Late comments would have been accepted but none were received other than those from Norfolk Wildlife Trust (April 2021) that had been previously misdirected
- 8.1.2. Immediately after the launch, volunteers delivered a full-colour printed copy of the Plan to each household by Christmas Day. A few copies were left in the village hall but not elsewhere as all residents had copies delivered. The Plan was posted on the Plan's website, accompanied by other supportive documents:
- A summary of the SURVEY17 results
 - Landscape and Heritage report
 - Preliminary Ecological Assessment report
 - Demographic details for New Buckenham
 - 2015 Housing Needs Survey (Breckland)
 - 1996 Village Appraisal (New Buckenham Society)



Figure 17 Display on website front page

- 8.1.3. The invitation for comments on the Pre-submission Plan were advertised in Parish News and Facebook pages.

8.2. Consultees other than residents

- 8.2.1. Comments were invited by email (figure 12) from statutory and other organisations including village groups. Apart from the detailed technical response from Breckland, there were 34 responses: three national organisations, one landowner, 29 residents some of whom were writing as couples, and one long standing visitor. A separate survey of landowners was also done, see para 10.4.

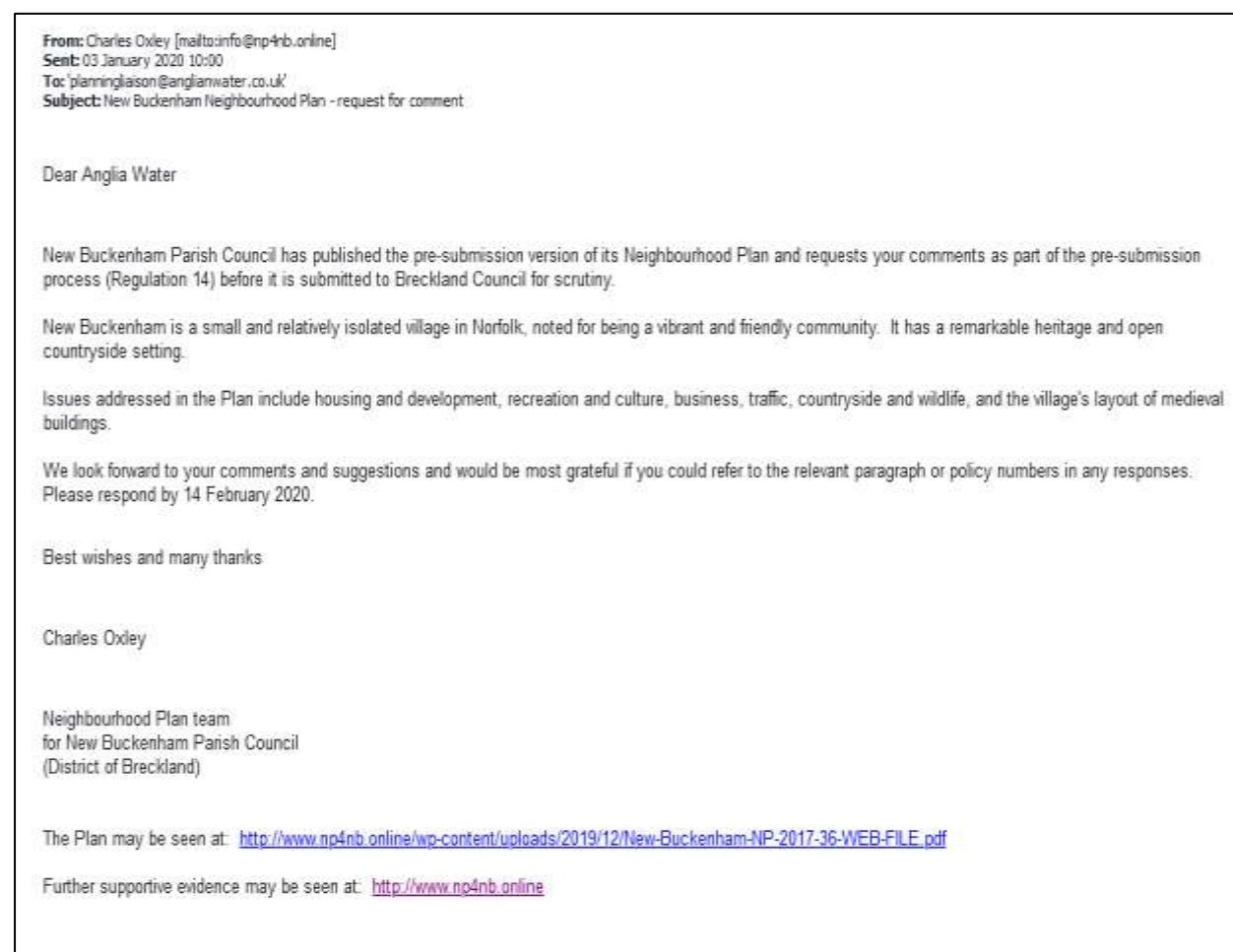


Figure 18 Sample email sent to statutory consultees

	Mailed	Reply		Mailed	Reply
Local Planning			Racial or ethnic		
Breckland Council	Yes	Yes	Friends, Families & Trav	Yes	No
Breckland councillor	Yes	No	The Travellers Movement	Yes	No
Norfolk County Council	Yes	No	Nfed Gypsy Groups	Yes	No
Norfolk councillor	Yes	No			
South Norfolk Planning	Yes	No	Faith	Yes	No
Old Buckenham PC	Yes	No	Dioces Nch Education	Yes	No
Banham PC	Yes	No	Quidenham Group	Yes	No
Carleton Rode PC	Yes	No			
Tibenham PC	Yes	No	Business groups		
			Nfk Chamber Commerce	Yes	No
National Planning			New Anglia Loc Ent Part	Yes	No
Homes England	Yes	No	Fed Small Businesses E	Yes	No
Natural England	Yes	No	Gtr Nch Develop Part	Yes	No
Environment Agency	Yes	No	Visit Norfolk	Yes	No
Historic England	Yes	Yes			
Network Rail	Yes	No	Disability groups		
Highways England	Yes	No	N&N Assoc Blind	Yes	No
Mobile Operators Association	Yes	No	Nfk Local Access Forum	Yes	No
BT Openreach	Yes	No	Norfolk Deaf Assoc	Yes	No
Equal Lives	Yes	No			
South Nfk Clin Care Comm	Yes	No	Village groups		
NHS England	Yes	No	Vestry and Village	Yes	Yes
NHS Property Services	Yes	No	NewBuck Players	Yes	Yes
UK Power Networks	Yes	No	NewBuck Silver Band	Yes	No
National Grid	Yes	Yes	NewBuck PCC	Yes	No
Anglia Water	Yes	No	Community Car Service	Yes	Yes
			High Bailiff's Trust	Yes	No
Voluntary bodies			Barber Almshouses Trust	Yes	No
Age UK Norfolk	Yes	No	Gardening Group	Yes	No
Community Action Norfolk	Yes	No	NewBuck Junior Football	Yes	No
Nfk Community Foundation	Yes	No	NewBuck Arts	Yes	Yes
Nfk Rural Community Council	Yes	No	NewBuck Vill Hall Trust	Yes	Yes
Nfk Archaeological Trust	Yes	No	NewBuck Cricket Club	Yes	No
CPRE Norfolk	Yes	No			
Friends of the Earth	Yes	No	Landowners		
Nfk Biodiversity Partnership	Yes	No	Mr Bond for clients	Yes	Yes
Norfolk Wildlife Trust	Yes	Yes	Mr Bloom	Yes	Yes
Norfolk Rivers Trust	Yes	No	Mr & Mrs Giles	Yes	Yes
Woodland Trust	Yes	No	Mr & Mrs Pearson	Yes	Yes
Ramblers Association	Yes	No	Mr Stimpson	Yes	Yes
Sport England	Yes	Yes	Ms Walker	Yes	Yes
Renewables East	Yes	No	Mrs Wright	Yes	Yes

Figure 19 Consultees formally invited to comment

Note: Rev. S Wright, of the Quidenham Group of parishes, had already responded as an independent reader during earlier drafting. The New Buckenham Society is omitted as some members were heavily involved in creating and drafting the Plan.

Review of comments made during consultation.

- 8.2.2. The responses from Breckland Council and Historic England were noted for being detailed and helpful, adding much to the value of the Plan.
- 8.2.3. The working party was pleased with the number and quality of responses from village residents ranging from broad brush issues to minutiae. There were several good ideas, most of which were incorporated into the Plan.
- 8.2.4. One landowner was critical of many aspects of the Plan, including the project consultation process itself, and made complaints which are displayed in Appendix 1. The other landowners were largely neutral towards the Plan.
- 8.2.5. Village residents were generally supportive of the policies in the Plan, particularly about heritage and environmental aspects. There was ambivalence about the need for new housing issues, reflecting the results of SURVEY17. Apart from two landowners who offered to make their own land available for development, no responses suggested suitable development sites. There were strong feelings about through traffic and parking congestion. The lack of a mobile phone signal and the need to provide for electric cars were frequently mentioned. There was a strong sense of community in many of the comments made.

Changes made to Plan following the Pre-submission Consultation.

- 8.2.6. There were few changes of policy made to the Plan as a result of the formal consultation, but there was extensive revision of smaller details for legality, accuracy and clarity. The section on Countryside and Environment was rewritten as there were several inaccuracies about designations of green and open spaces. Some of the paragraphs in the narrative were reordered to make them more logical and some policies were designated instead to being community actions.
- 8.2.7. The working party held a workshop with the Parish Council (by Zoom) on 7 December 2020 to review the Plan's draft Submission Version, note the major revisions and endorse the policies.
- 8.2.8. The working party is grateful for all the comments received.
- 8.2.9. The comments, responses and actions taken as a result of the Pre-submission consultation are in the Comments and Responses Report at para 10.8.

9. REGULATION 15: SUBMISSION TO BRECKLAND COUNCIL

This submission comprises the following documents:

- The map showing the Designated Neighbourhood Plan Area
- The final Neighbourhood Plan
- The Consultation Statement (this document) containing:
 - The people and bodies that have been consulted for the plan
 - An explanation how they were consulted
 - Summaries of the main issues and concerns
 - Details of how the issues have been considered and, where relevant, addressed in the plan
- The statement outlining how the plan has met the required Basic Conditions:
 - Has regards to national policy
 - Contributes to sustainable development
 - Is in general conformity with the Breckland Core Strategy (Local Plan)
 - Is not breaching and is compatible with EU obligations
- The documents from Breckland Council notifying New Buckenham Parish Council that:
 - A Strategic Environmental Assessment is not required for this Plan
 - A Habitat Regulations Assessment is not required for this Plan

10. RESULTS

10.1. Surveys of residents

These results are not included in the body of this Consultation Statement as they are lengthy and would make the printed version unwieldy. They are however posted on the Plan's website www.np4nb.online and may be downloaded using the links.

- SURVEY17: [Questionnaire](#)
- SURVEY17: [Results summary](#)
- SURVEY17 results: [Stats and charts](#)
- SURVEY17 results: [Free text answers](#)
- Residents' [Wildlife survey results](#)

10.2. Focus Groups and additional surveys

10.2.1. Report of Faith & St Martin's Focus Group – 26th February 2018

- 29 residents were present. Nine residents sent their apologies and comments for consideration. The forum commenced with a SWOT assessment and conclusions were summarised as follows:
- Quote: *'Bridging the Gap'*
- The key to the continued viability of the Church was identified as bridging the gap between the village and Church communities, and how to achieve that. The common agreement was that secular events were the way forward, both to increase footfall and to support income and thus this important village building. It is important to engender familiarity with the building, so people do not feel intimidated entering it. It is important to note that any money raised for the local church remains with that church and is used for general Diocesan purposes. Everyone was agreed that the church's heritage value is imperative and that in order to maintain it, assistance from the village (and wider community) is important and required. In terms of timescales, plans going forward need to be implemented within the next 12 months, in order to sustain momentum and secure the long-term viability of the Church.
- Going Forward – Points for inclusion in the Neighbourhood Plan:

Agreed Policies	Notes
1 To develop more secular uses 2 To promote heritage awareness 3 To advertise events, space and opportunities for use 4 To develop tourism with other organisations 5 To increase and expand outreach initiatives	Policies 1-5: there are potential issues with: Manpower; avoiding competition with village hall; heating; advertising

6 To create a “Friends of St Martin’s” group to develop the above	Policy 6: This will be instituted with immediate effect, because of the considerable interest expressed both at and outside the Forum
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10.2.2. Report of Village Groups and Societies Focus Group - 5 March 2018

Invitations were sent to the following organisations:

Village Hall Trust	Football Club
Fundraisers	William Barber Almshouse Trust
New Buckenham Players	High Bailiff's Trust
New Buckenham Arts	Parish News Committee
Good Companions	Silver Band
New Buckenham Society	St Martin's Church
200 Club	Parish Council
Gardening Group	War Games
Cricket Club	

15 people attended and unattributed comments were collected on post-it notes throughout the meeting and collated into a set of action point, as follows:

Communicate better, more promotional activities	Combine Church and Village Hall activities i.e. concert in Church, refreshments in Village Hall
Social media good, works well for some e.g. firework night	Have more, larger Annual events rather than monthly meetings
Use Facebook more to promote activities	Combine with other villages e.g. Good Companions numbers have risen due to surrounding villages closing their clubs
Important to get 18s to 30s involved	Cricket Club could go for grants to improve facilities
Form a Communications Group	Opinion as to whether increases in housing and tourism would enhance activities was divided
Use Village Noticeboard more, make it easier to use it	Youth Club run by parents
Use shop/ cafe/ pubs to advertise events	Mother and Toddler Group
Have a Group meeting in the Hall (as around 5 years ago) where groups advertise their activities	Photography Club
Village children not seen around, more interested in social media and the huge variety of indoor entertainment	Wine Club
Hold a Games Day - table tennis, pool badminton etc	
Village Hall more financially secure now but need to attract more weekend bookings	
Build a village car park	

10.2.3. Report of Families and Children Focus Group - 24 March 2018



Figure 20 Flier for children and families focus group

- This meeting was so poorly attended that the organiser instead surveyed households with children using this letter:

Dear Tom, Dick and Harry*,
Or, for those with children too small to answer for themselves:
We would very much like to have your views (*and those of your family) on what you think ought to happen in the village, both now and in the future, as the children of today, are the adults of tomorrow.
This is a wish list and can include anything and everything, no matter how extraordinary and amazing!!
It should have things you would like to do straight away and others that would be for the years to come.
PLEASE do this, and use the sheet included with this letter, which has some headings and suggestions to get you thinking. We would like it back before the end of the Easter holidays if possible – there is a stamped addressed envelope enclosed for your reply.
All your views will be taken into account, but no names will be used.
If you really aren't interested, just seal the envelope and put it in the post back to me.
Mandy Hartley

Figure 21 Survey of children and their parents

WHAT WE WOULD LIKE IN THE VILLAGE: LEISURE	Votes
Play group or toddler group	8
Film club (all ages, not adults)	19
Music/art for children	8
Tennis/basketball court/netball/5-a-side court (like in Kenninghall or Tacolneston)	11
Lectures/societies/show & tell days -older villagers vs kids (learning from each other)	4
Dog agility/training	3
Group for teenagers (youth club) - sport/social club 16	16
Table tennis club	9
Drama (for younger people) (a summer play children can take part in)	12
Expeditions	2
Bike or go cart track on field at village hall/somewhere safe for children to ride bikes	6
Running track on field at village hall	1
A bigger play safe - but keep the other one	1
Outside gym for teenagers	3
Monkey bars	1
Athletics club	1
Something new at the playground, a bigger challenging twisty-wisty slide in the park	2
Swimming pool	9
Lego activities club	2
Games club to play games like hungry hippos with other children	1
Brownies/rainbows/beavers in village	2
Trampoline park	1
Sweet shop	1
Open air cinema in summer where families can picnic & enjoy a film	3
Better funding for cricket club/pitch	1
Saturday morning crafts/cookery in village hall	1
Photography club	1
Hunting/mini beast club	1
Forest school area	1
Outdoor water play area (splash park)	1
Skate board park	4
Club for pool	1
More than one football team/football practice for all ages	3
Small leisure centre	1
Library	1
Markings for rounders and other games	2
Facilities for badminton (for families)	2
A play house/castle	1
Outings for families	1
Fishing	1
Karate club	1
Video game club	1
Cycling club	1

Figure 22 Children and parents' responses to survey

10.3. Survey of Landowners

10.3.1. A letter was sent to each identified land owner.

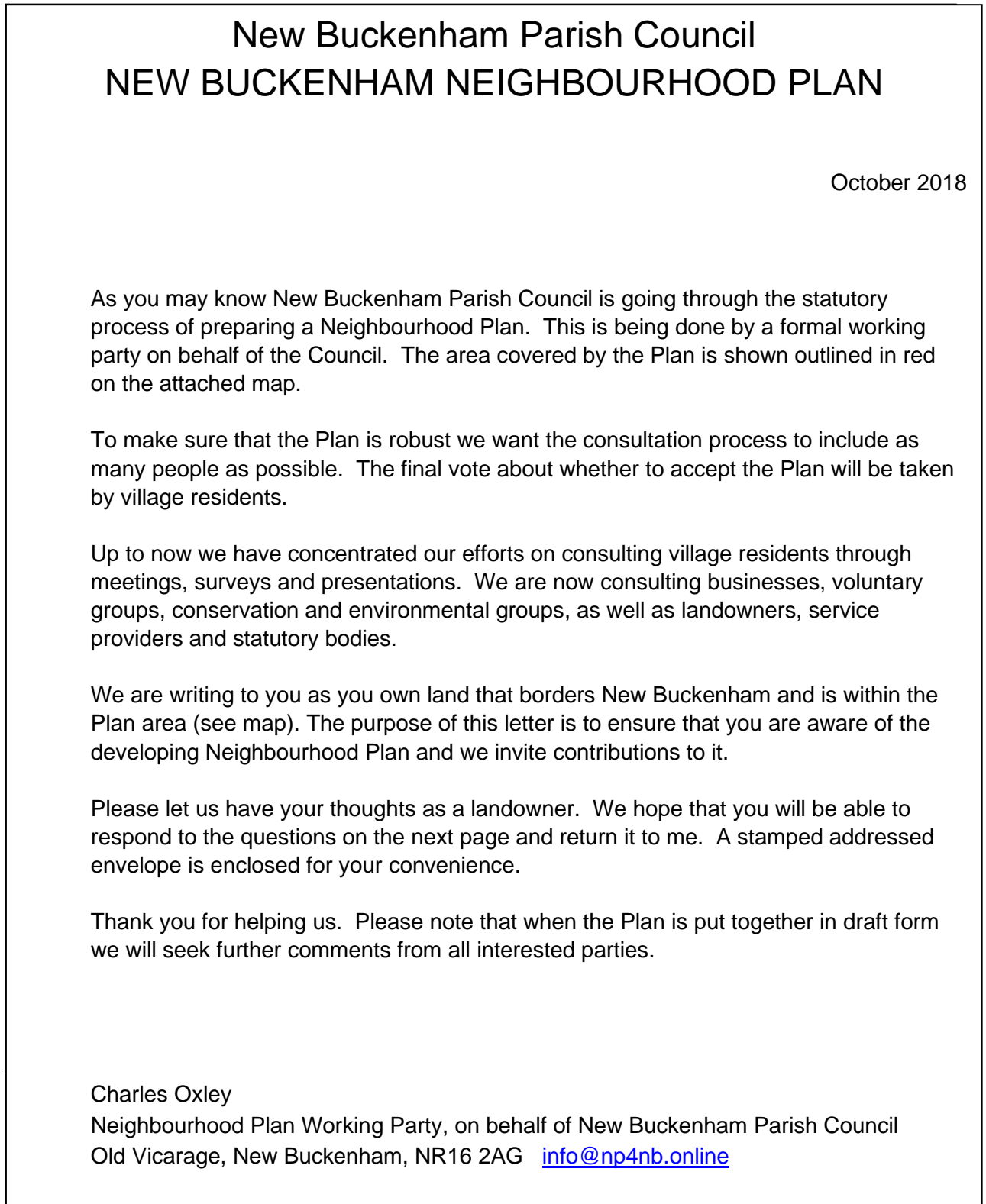


Figure 23 Letter sent to landowners (first of three following pages plus map)

NEW BUCKENHAM NEIGHBOURHOOD PLAN

1. Please tell us exactly where you own land within the Plan area. It would be most helpful if you could mark the map overleaf when you return this page to us. We can then see if we have included all the owners of land outside the built village.
2. Are you anticipating or do you hope for any change of use for this land?
3. Please let us have any further comments and views about land use within the area designated for the Neighbourhood Plan.
4. Are there any other issues you believe should be considered in planning New Buckenham's future?

Please indicate your land overleaf and return this page using the enclosed stamped addressed envelope.

Thank you for helping us.

10.3.2. Landowners' responses to survey

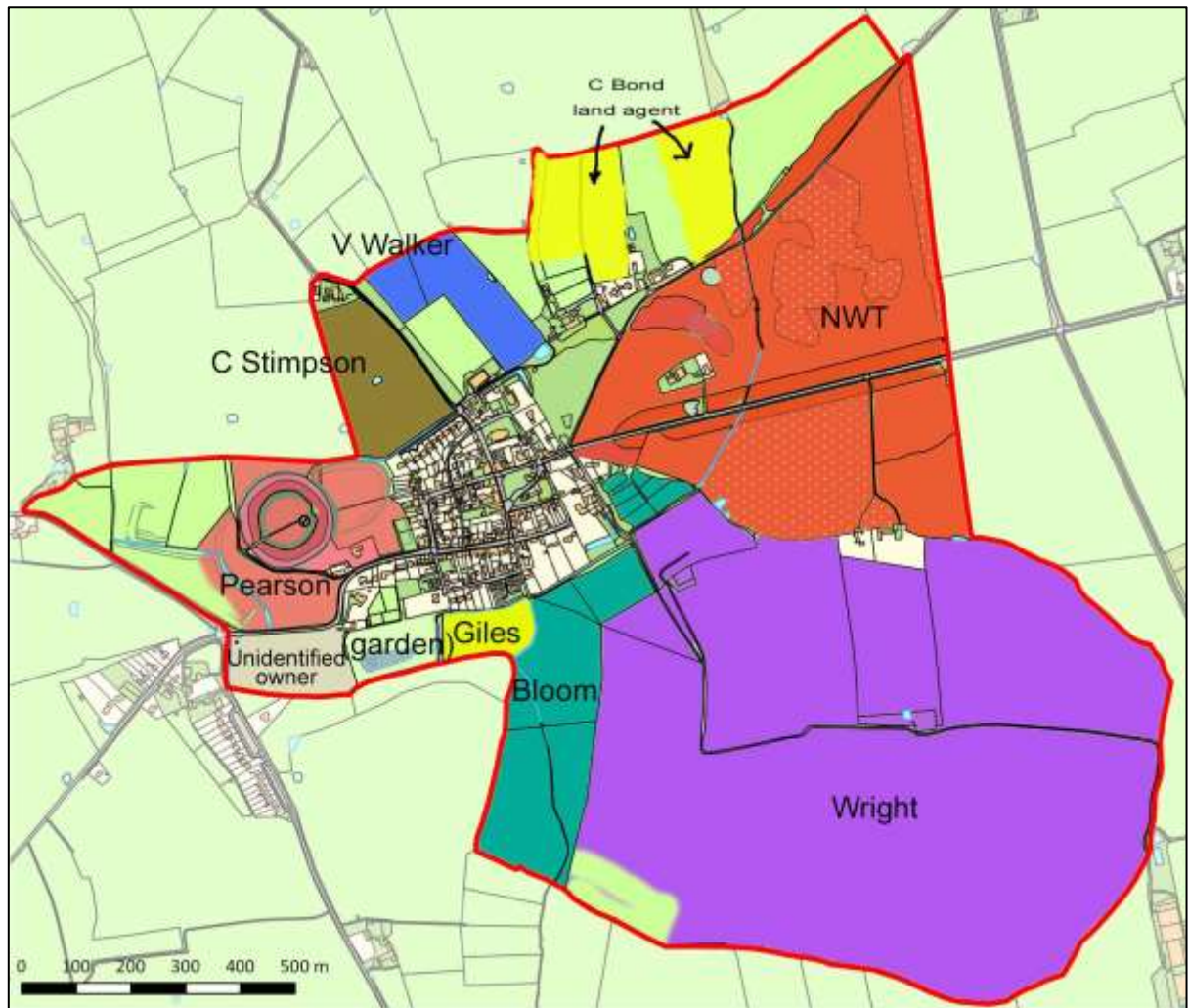


Figure 24 Map of surrounding land ownership

Notes:

- The owner of a piece of land south of the castle could not be identified.
- The farmland west of the castle was subject to probate at the time of the survey and questioning was not appropriate.

	Q2 Anticipated changes?	Q3 NP area land use comments	Q4 Other planning issues for New Buckenham?
R Bailey	No response		
Bloom	Would like to develop 3 acre plot at north part of meadows for housing	-	-
C Bond (land agent)	No response other than telephoned query about right of way.		

C&S Giles	Yes C&S Giles letter 1 C&S Giles letter 2	-	As the settlement boundary has been moved out to the Parish Boundary. We strongly believe that all who have an interest (resident, business, landowner etc) within that area must be entitled to vote on a plan which could affect us all.
Norfolk Wildlife Trust	No response		
C Stimpson	Mr Stimpson letter 1		
C&H Pearson			
V Walker	Undecided	-	Improve mobile reception and broadband
T&H Wright	No change	-	None

Figure 25 Responses from landowners

10.4. Tourists and visitors survey

- A short survey was carried out by members of the working party, by personal interview, with small local businesses and users of village amenities. The purpose was to assess the effect of tourists and visitors and ascertain their views on promoting the village to encourage more tourists and visitors.
- All businesses stated that they get tourists and visitors. 75% saw this as a benefit.
- 60% stated tourists and visitors were a significant proportion of their footfall with a mixture of car, cyclists and walkers depending on the type of business.
- All businesses promoted themselves with some type of online presence.
- 50% stated that if the village as a whole promoted itself more that they would derive a benefit. Suggestions included attractive signage at both ends of the village, walking routes, cycling maps and joint business ventures.
- All businesses would contribute to a village map or leaflet. Amenity users were interested but mostly had no budget.
- All stated that the village needed to encourage visitors/tourists in order to keep local businesses vibrant and bring revenue into the village, but users of some of the amenities pointed out that overcrowding and littering was an issue in summer.
- Norfolk Wildlife Trust stated that an increase in visitor numbers would be desirable as New Buckenham Common is under used and that careful promotion would be welcome.

- 50% stated that car parking was the only major disadvantage, with a suggestion that a formal car parking area be provided on the edge of the village.

10.5. Report of Walk and Talk with the Architect - 3 November 2018

10.5.1. Announcement in October 2018 Parish News:

“WALK AND TALK WITH THE ARCHITECT

“Building has always been going on in the village, whether brand new constructions or alterations, renovations and enlargements to existing homes. How this building is done is determined by the owner, the architect (if there is one) and the requirements of Breckland planning and building control. In New Buckenham’s case, the Conservation Area status and whether or not the building is listed hold huge sway. In all this there can be inconsistencies between neighbouring district council policies.

“Should the village itself have a view which could be expressed in the Neighbourhood Plan? Should the village have a view about the design of any new houses or major alterations being done? New houses could be on existing sites (such as the old garage) or new sites outside the constraints of the Conservation Area. Should the village have a view on whether new buildings should be of traditional materials or otherwise? How important is the space between houses and the ability to have green areas?

“Do you have a view? Please come to our ‘Walk and Talk with the Architect’ event on the morning of Bonfire Night. We’ll walk around the village with an architect, point out what we like and don’t like, and then discuss it all at the Village Hall. What we discuss will inform the Neighbourhood Plan, so come and let us hear your views - and bring your camera!

“Walk and Talk with the Architect is on Saturday 3rd November at 10.00am sharp starting at the Village Hall. After an hour’s stroll around the village, we’ll be back at the Village Hall for coffee and a discussion. Admission is free and all are welcome, young and old. We particularly look forward to seeing newcomers to the village.”

10.5.2. Report from the event

- 23 people attended the event (some for part of the time).
- Ben began with personal comments based on his observations from the morning walk around the village: a compact village, no ribbon development, good quality boundaries and low-level roof lines. Densely occupied. The Marsh Lane terraced development was generally regarded as successful, but the garage site was controversial (though constructed with good materials). Also noted that the in-filling of the 1960s and 1970s had not been of such good quality.
- Quality issues particularly in relation to UPVC window: in previous years UPVC had been rather chunky but plastic windows were now available with more slender profiles.

Timber might be regarded as preferable but there was more choice. Ben confirmed that, contrary to expectation, UPVC was recycled.

- We learnt some useful information about the current planning process in Breckland. Noted that the Council's activities were mostly outsourced to CAPITA thus potentially reducing (or diluting) awareness of local preferences, history and design. Local parish councils therefore had a more significant role to play in determining the suitability of planning proposals for their community. And, since Council officials were overloaded, planners would welcome a community's design guide in a Neighbourhood Plan.
- There was a lengthy discussion on quality. Ensuring high quality is not just about materials and detailing but is all encompassing. Aspects such as how buildings are situated or arranged on site, their mass, shape and style etc are equally important. Even how well windows are arranged and proportioned is important in a good quality scheme. New building design should not have an adverse effect on neighbouring properties through poor design and inappropriate scale.

10.5.3. Action points

- Ben suggested that the Plan might put together a palette of acceptable features such as boundary features, hedges, walls (rather than close boarded fencing) and parking. Other features to consider included electric charging points and bin storage.
- The Parish Council could be provided with a tick list of key criteria (say 4-6 issues) which might be applied to planning applications. These could include:
- Have the developers discussed this application with the community, with neighbours and with the Parish Council?
- Does it meet high standards of design and quality, especially when near listed buildings?
- Is there adequate parking?
- Other?
- The Parish Council should have scrutiny of any suggested design changes during the planning process

10.5.4. Liked in the village

- Marsh Lane brick and flint faced terrace
- Materials used in old garage site especially uPVC windows (not necessarily visual impact of whole development)
- Some new developments are high quality
- Hedges, traditional material walls, boundary fences
- Compactness

10.5.5. Not liked in the village

- Anonymous design of some new houses (could be anywhere)
- No place for bins in some new houses, poor parking provision

10.6. Survey of businesses

10.6.1. A questionnaire was completed by attendees at the Business Forum in March 2018.

Questionnaire Returned after Business Forum 26-3-2018									
Length of time in biz	Time in NB	Age	Chamber contacts	How many in biz	Gd thing about NB	Bad thing about NB	How to improve your biz	Do you want a Biz group?	Want Training? Web/digi Accounts Law/tax
2-3 yrs	2 yrs	31-40	none	1	Customers nearby	Mobile service/wifi/public transport	Premises	yes	yes
2-3 yrs	2-3 yrs	31-40	none	1	Use VH-access to clients	No space to hire long term	Premises /help marketing	yes	yes
14 years	14yrs		none	1	Countryside For holistic health	Mobile/internet connection	Help marketing/funding	yes	yes
22 yrs	22yrs	51-60	none	4	nothing stated	Lack of local support.need affordable homes to encourage younger footfall	All bizs in village need local support Including trades, Shops,pubs	No	No
20	20		none	1	Live& work here & enjoy being in NB	Elderly village for aged people. NIMBY	More support from locals	No	No
2.5 yrs	2.5 yrs	31-40	None + Sector specific history	1		Mobile phone	Need premises	yes	Yes-a/c , law , tax
7 yrs	7yrs	31-40	none	1	Beautiful location	Broadband speed	Help networking	yes	Yes - web,a/c,biz law,tax
15yrs	1yr	41-50	none	5	Enjoyable place to work	Poor mobile signal	Premises-outbuilding conversion	yes	No
5 month	5 mon	31-40	none	4	Supportive community Beautiful location	Lack of parking Mobile phone	Expansion in 5yrs If it goes well	yes	yes
25 yrs	25 yrs		none	1	Good b/band	Poor mobile		yes	yes
40 yrs	20	61-70	yes	1	Historic/ Wildlife haven	mobile	networking	yes	yes
12	12		yes	1	small	mobile	Making contacts	yes	yes

Figure 26 Answers to Business Forum survey, March 2018.

Summary:

- Approximately half of the businesses are less than 5 years old and are recent start-ups, needing help.
- Very few have had any contact with professional business organisations.
- Biggest concern is lack of mobile service.
- Biggest structural requirement is premises.
- Strong preference for a Business Group.
- Strong desire for help with web sites, on line presence, legal accounting and tax rules.
- A number of businesses travel across the county visiting home-based premises or halls.

10.7. Pre-submission consultation: comments and responses

NEW BUCKENHAM NEIGHBOURHOOD PLAN Pre-submission consultation (Regulation 14) Comments received and responses by the Neighbourhood Plan Working Party		
<i>Please note that the paragraph numbering in the comments column refers to the Pre-submission version of the Plan. The responses in the right-hand column refer to the Submission version, some of the paragraph numbers of which have been changed. Red text denotes where changes have been made.</i>		
	COMMENTS	RESPONSES
01 Sally Elvin	<p>Thank you for the email, I have read through the plan, which I must say has covered all aspects of village life, es and properties, for the future it has also taken into account individual needs for all. The parking problems will only escalate as the village grows, and there seems to be no answer. But if those of us used our drive instead of parking in the road it would help, especially in Kings Street.</p> <p>The amount of traffic that comes through the village is a problem especially the large lorries, but as a B road I am sure there is not a lot we can do about it.</p> <p>These are my thought on the plan which I am sure is mostly the same as everyone involved.</p>	<p>Thank you for your comments. The traffic and parking issues are some of the most frequently raised and difficult to solve. The Parish Council has, and will continue to have, meetings with Norfolk County Council's Highways Department about this matter. NCC is aware of these issues in New Buckenham but is constrained by significant issues of cost and the legal aspects of altering HGV routings and speed limits.</p> <p>These are covered in the Community Actions that that need to be taken for Traffic and Parking, but they are outside the planning controls stipulated in the Plan. Please see CA TP 1-6 in the Plan and the traffic report in the Evidence Pack: http://www.np4nb.online/wp-content/uploads/2019/12/Highways-meeting-report-28-2-19-modified.pdf</p>
02 New Buckenham Players	<p>New Buckenham Players have been treading the boards for the past forty years. We have in that time produced over a hundred plays and pantomimes. It has had several Chairmen and committee members to enable this to continue; we have had amateurs dramatic support from the New Buckenham community and in recent years the support from other surrounding villages, which has enabled the group to grow and keep fresh ideas forthcoming.</p> <p>Our audience has always been supported by not only New Buckenham residents but also from other local villages such as Attleborough, Banham, Kenninghall, Diss, Wymondham, Redgrave and Old Buckenham. The support from the local area has enabled us to continue with our Productions. We thank them for attendances over the years. And hope that their support continues.</p>	<p>Thank you for your comments. The Players' productions and other associated arts events are a leading mainstay of village life. Furthermore arts events attract visitors which in turn increase awareness of the village hall's facilities and the village as a whole. The Parish Council will continue to support arts events by seeking out grants and donations to help support the drama, music, dance and other arts-based features which benefit both adults and youngsters alike.</p> <p>The village was originally founded for trading, rather than being the usual agricultural settlement. Visitors to the village have always been the lifeblood. Although there are now fewer retail businesses in the village, there are numerous small non-retail businesses and sole traders working in and from the village.</p>

	<p>By keeping the New Buckenham Players going also brings into the village new residents that like the idea that we have this along with all the other groups such as The Reading Group Bridge, Arts, badminton, cricket, football. War games, sewing group and many others that keeps the village thriving and to me make this village unique.</p> <p>I also as a resident have an Annexe that is rented out via Air B&B. I have been doing this since August 2018. I have had a constant flow of visitors to the village from as far as Australia, Sweden, France. All here visiting Norfolk while on their travels. All have said what a lovely and welcoming village we are.</p>	<p>These important business and social aspects are often outside the planning controls stipulated in the Plan. That is why we have introduced Community Actions for Business and Tourism, and Recreation, Health and Culture to highlighted actions we in the village can all take. See Community Actions CA BT 1-3 and CA RHC 1-6 in the Plan.</p>
03 Mark Greenhow	<p>Having read the document in full - the only constructive feedback I can offer is to consider inclusion of a simple map with the various street names.</p> <p>Whilst we take for granted that everyone knows every street - this may not be case and there are lots of street references.</p> <p>Otherwise Plan is an excellent document.</p>	<p>Thank you, an excellent suggestion and many thanks for your support of the Plan.</p> <p>A map of street names has been inserted at the front.</p>
04 Sports England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee</p>	<p>Thank you for your comments. The Neighbourhood Plan Working Party assumes that this is a generic response as it mentions nothing specific to our Plan</p> <p>Policies RHC 1, 2 and 3 are designed to safeguard local facilities and encourage further development and modernisation of such facilities to benefit the community.</p> <p>Current recreational pursuits include football, badminton, cricket, walking, cycling, fitness and dance groups. There is also a popular playground with play equipment designed to appeal to children of all ages and the Parish Council is currently planning to expand the facilities to include exercise equipment for adults.</p> <p>Sport England's Playing Fields Policy and Guidance document and the other guidance documents mentioned below have been received by the Parish Council (owner of the cricket ground) and</p>

	<p>role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p>	<p>forwarded to the Village Hall Trust (owner of the village hall playing field).</p> <p>This document has been forwarded to the VHT.</p> <p>This document has been forwarded to the VHT.</p>
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	<p>planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p>	<p>This document has been forwarded to the VHT.</p> <p>To be received by the Parish Council.</p>
05 New Buckenham Arts	<p>I have read through the Neighbourhood Plan and can't identify any issues that affect New BArts and its viability. Nor can I spot anything that has been omitted. On the contrary, it seems to me to be a very thorough and well-organised document, and I congratulate all those involved in its production.</p> <p>I am copying this to other New BArts members in case they have any comments, requesting that they correspond with you directly as I will be away from 4 to 15 Feb.</p>	<p>Thank you for your comments. Additional comments were received from The Players (please see above) and it is hoped that these responses are helpful as they apply to the arts in general.</p>
06 Andrew Bingham	<p>I appreciate that a lot of work has gone into the plan to get it to this stage, the work of the team is appreciated and there is much interesting information particularly in relation to heritage.</p> <p>1. The first aim of the NP is to consider development that fulfils local need. I cannot see how the plan achieves this goal. The NP dismisses the Housing Needs survey carried out in 2014 and claims that this is out of date. While I appreciate that needs have changed the NP provides no formally recognised replacement or re-run of the Housing needs survey. The general survey superficially covered housing need but with insufficient depth to understand the form of housing necessary to meet the identified need.</p> <p>The 2014 housing needs survey identified that there was a need for a mix of affordable rented property, and shared equity. Furthermore the NP wholly fails to understand the purpose or definition of</p>	<p>Thank you for your comments.</p> <p>The purpose of neighbourhood planning has always been to build a framework of issues and potential solutions that reflect the opinions of the majority of residents and land owners in the designated Plan area. The Plan provides support for the Parish Council in its decision-making including matters that relate to land use.</p> <p>A Plan should be under regular review and, as far as possible, be future-proofed to retain relevance over two decades. As directed in the Government's Neighbourhood Planning guidelines (Paragraph: 104 Reference ID: 41-104-20190509 updated 13 May 2020) "neighbourhood planning groups are not required to plan for housing." The Local Planning Authority imposes no specific requirement in its recently revised Local Plan.</p> <p>The Housing Needs Survey of 2014 (included in the Evidence Pack) is a starting point for the discussion about housing development in this village. The 2014 survey identified a need for a mix of</p>

	<p>affordable housing and at 2.5.10 a bizarre statement seems to try and dismiss affordable housing as a concept, and shows that the team do not understand how affordable housing can be provided in a village defined as a rural settlement without a boundary. The Plan fails in this respect and it is up to the team to understand the issues around affordable housing. Affordable housing in this situation is provided through Exception Sites – there is no reference anywhere in the document about these sites and use to provide affordable housing. Indeed the plan fails to even include a definition of affordable housing and tries to refer to this as ‘cheaper’ housing. Affordable housing is not ‘cheaper’ in that the build cost and standard can be higher than for the equivalent market properties. It is the rents that are affordable and not that these are ‘cheaper’. Even in the Glossary there is no definition of affordable housing, the NPPF provides a very clear and detailed definition and this should be included in the glossary.</p> <p>My overriding impression is that this plan has been written to prevent new housing in the village, and particularly to prevent affordable housing – an impression that is overwhelming supported by the avoidance of this term in the glossary. The plan provides nothing to guide the Parish Council on where new housing should be located, the majority of issues around heritage and ecology are already covered in detail by the NPPF and PPG. Indeed the only housing policy the plan appears to provide is that people can go and live in Attleborough – this is not a housing policy for New Buckenham.</p> <p>2. The plan provides a number of Aims in 1.7. It is not clear which of the Policies through the document satisfy specific Aims, to me the beginning of each Section should repeat the Aims and policies should be clear on which of the Aims they are intended to satisfy. The Policies seem to be more a series of prescriptive statements, and unachievable demands.</p> <p>3. In Policy CE 2 the plan attempts to designate local green spaces, including the village hall playing field, and Cuffer Lane. The Village hall has not been consulted on whether the playing field should be designated as a countryside and environment habitat. The playing field is a</p>	<p>affordable housing. SURVEY17 also reinforced the wish for smaller, less-expensive housing units, i.e. no 'more executive homes', while at the same time expressing anxieties about the risk of increased traffic and parking problems.</p> <p>Reservations had been expressed about the wording of the Housing Needs Survey and the need for a specific number of affordable houses extrapolated from a limited sample. Individuals' needs vary over time but as noted in para 2.5.7 that 'there is likely to be a wish by a number of households (that may comprise single occupiers) to have housing that could be described as affordable as defined by the NPPF'.</p> <p>The Working Party agrees that paragraph 2.5.10 is unhelpful and has therefore been amended.</p> <p>It is not possible for a neighbourhood plan to prevent development and this Plan does not set out so to do. Indeed para 1.7.1. takes a positive approach to new development.</p> <p>It is correct to say that this Plan has not identified potential house building sites, as already discussed with the Parish Council. Rather the Plan has focused on the ‘context’ for future building and development and offers robust guidelines or criteria for the Parish Council now and in the future.</p> <p>These points are helpful and the wording will be revised to make it more clear and link the aims to the policies. The text has been revised to link aims and policies.</p> <p>The section was poorly written and has been revised.</p> <p>There is little wildlife habitat value in playing field surfaces themselves but there</p>
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	<p>recreation space and not a wildlife habitat and must therefore omitted from this designation. The same can be applied to the cricket field which is clearly not managed as a green space to support wildlife.</p> <p>I do not understand how Cuffer Lane can be designated as a Local Green Space – it is specifically a public highway. The hedges alongside the road are green corridors but I cannot see the purpose of designating these margins as local green spaces, is it intended to control the management of the hedges? Furthermore the allotments are not a greens space, they have a specific purpose that does not include becoming a wildlife habitat.</p> <p>I hope these comments are of some assistance.</p>	<p>is considerable habitat value in their surroundings such as the maturing boundary between the village hall playing field and the cemetery and the allotments. Similarly there is value in the trees and rough ground surrounding two sides of the cricket ground.</p> <p>There is, incidentally, no obligation to consult when designating Local Green Spaces but the Parish Council will do this during the submission process.</p> <p>There are now no plans to designate Cuffer Lane as a Local Green Space. However, village residents greatly appreciate the Lane for its recreational value and for the role it plays in supporting local wildlife. In 2016 New Buckenham Parish Council stated to Breckland that "the Cuffer Lane hedge is clearly classified as 'important' under the terms of the Environment Act 1995 and the Hedgerows Regulations 1997, and as such should be protected from removal." To this end some form of management would make sense. This section has been revised and the overlaps have been removed.</p>
07 Tom Nash	<p>Both Cuffer Lane and the Bent Road (Wymondham Rd) should be posted as 'Quiet Lanes' and the ridiculous and dangerous 60mph limit removed from Bent Rd.</p> <p>The main remnant of the Town Moat is the NE section, partially overgrown around the Grange. It is not overgrown with trees; they are on the side; the only growth within is small stuff and could easily be cleared. The pond referred to is on private land, unseen, and the ditch by St Martin's Gardens is not to the size of the above nor even easily seen due to vegetable growth.</p> <p>I wonder whether there should be a high requirement for energy saving, in view of the current Climate Change debate.</p> <p>There are a number of places where external lighting impinges onto public space, such as in Rosemary Lane. What will be done to conform to the Dark Skies Policy?</p>	<p>Thank you for your comments. Norfolk County Council's Quiet Lanes project was introduced in southern Norfolk in 2004, taking in an area between Attleborough, Diss and Thetford. Cuffer Lane was one such Quiet Lane but the project has now lapsed. Cuffer Lane and the Bent Road (a cul-de-sac) have no speed restriction as they do not have the qualifying criteria such as street lighting and numbers of houses fronting them.</p> <p>The Town Moat has been mentioned in other comments. The Town Moat has been listed in a Community Action.</p> <p>A requirement for energy saving (LH2, page 15) has been picked up by several respondents and has been included in amendments to the Plan.</p> <p>Some domestic lighting does indeed impinge adversely into public space. Individual householders will be made</p>

	<p>What might be done about existing boundaries? The flint wall in Rosemary Lane is in very poor condition and may fall at any time. The centre garages do not have ownership of it. It is one of the oldest boundary walls in the village.</p> <p>The speeding is excessive and continuous. Can nothing be done to reduce the speed? Current flashing sign is not effective. Further, rat-running through Chapel Street is common, West to East; if the priorities were changed at the bottom of Church Street, it would slow the traffic. A very good production. Thank you</p>	<p>aware of the issues and will adjust such lighting accordingly. These are covered by the community actions at the end of 2.4 Dark Skies.</p> <p>This old wall is in poor condition. The Parish Council has been informed of this comment and will discuss the issue further.</p> <p>Traffic speeding on the B1113 (and on back roads) is of great concern to the majority of residents in New Buckenham, and is likely to remain so. The working party met with Highways Officers on three occasions and has kept in constant touch. The Parish Council will build on these relationships and keep the dialogue open with Highways as it is a matter of great general concern. These issues are outlined in Section 2.6.</p>
08 Andrew Biggs	<p>As I have moved in to The Village only recently (June 2019) I feel it inappropriate/difficult to make detail comment. I would, however say The Plan has really impressed me with its wide ranging detail and comprehensive overview (there has obviously been an enormous amount of work gone into this!). I could find nothing to criticise and would be happy to see it carried forward as is.</p>	<p>Thank you, and welcome to the village! The Parish Council hopes the revisions after this consultation will make for an even better Plan!</p>
09 Mike Boswell	<p>General I support the aims of the Plan and find nothing to disagree with, but I have a proposal as follows</p> <p>Section 2.6: As climate change becomes, in many people's opinion, an emergency, the plan should take every opportunity to reduce carbon footprints even at a local level. One way to do this is to encourage the use of electric vehicles (EV's). In our village few homes have off street parking so EV charging is not very practical.</p> <p>I suggest looking into communal fast charging points, located perhaps in the village hall car park. Payments could be adjusted to make a small profit, perhaps with a discount for residents. As well as encouraging the use of EV's, this could raise a modest income for the village. It would also encourage owners of EV's to visit the</p>	<p>Thank you for your comments.</p> <p>Thank you for raising this issue. EV charging points are further emphasised in the text. They are in HB3 and Community Actions TP 1 – 6 and CA RHC 5 and 6.</p> <p>The village does indeed need charging points available for residents who are unable to do this on their own premises. The lack of off-street parking for many private homes means that communal charging points are needed. Upgraded government funding is likely to be available over the next year or so, in line with the</p>

	<p>village and use the local businesses. This may sound radical but Section 2.6 should be technically possible. There would of course need to be sufficient power available and a payment system and adequate security would also be needed.</p> <p>Many thanks</p>	<p>Government's Industrial Strategy published in 2018, and the Parish Council will seek support for the village.</p>
<p>10 Steve Highton</p>	<p>Can't really find fault with the excellent N.P. - I would hope that it's now able to go forward without any 'watering down' - I do think that it is important to draw firm lines so that village residents can have a strong voice in determining the future of the village. The plan does this; there will always be room for flexibility and innovation with regard to our specific future decision making.</p> <p>New Buckenham is unique re. Heritage and environment, but it is also unique from a social / community viewpoint, largely due to its compact form and the character of its housing stock. Hopefully we can protect & enhance the village and its surroundings throughout the lifespan of the plan.</p>	<p>Thank you for your comments and support.</p>
<p>11 Annie Dalton</p>	<p>1.7.1 Excellent aims, especially concern for ecological environment of our village, support for renewable and sustainable energy sources, and improvement of local telecommunications.</p> <p>'This Plan encourages the protection of existing habitats and the provision of wildlife corridors to promote biodiversity.' These kinds of policies are music to my ears! Also very pleased to see you encouraging the planting of new trees and 'species-rich' hedgerows. We should all be planting more carbon-capturing, wild-life friendly trees wherever possible. 2.3</p> <p>'A budget and funding sources should be identified to offer grants' etc. Yes, absolutely. I agree with every policy suggestion on this page. This is all very dear to my heart. CA CE4</p> <p>2.4: Dark skies and light pollution. Yes, totally agree with all these.</p> <p>2.5: I know this is a complex issue, but I agree that if there is to be any future building, smaller, more affordable and more sustainable homes are the way to go.</p>	<p>Thank you for your comments. The Neighbourhood Plan has taken a long time to put together and, although approaching its final publication, this is in reality only the beginning. The policies simply provide guidance for the never-ending work to ensure that this unique village is as the residents want it to be. Your support is much appreciated.</p> <p>There has been a lot of interest in the environment and sustainability and the Parish Council hopes that the proposed Community Actions will go some way to meeting local expectations.</p> <p>The use of any Parish Council funding for community projects is essential.</p> <p>The Plan provides for a framework within which to assess and establish high quality and sustainable development.</p>

	<p>HB 6: Yes, yes! And we will have to provide for electric vehicles sooner rather than later since petrol and diesel vehicles are now to be phased out.</p> <p>2.6.13: My vote is for the village boundary gateway.</p> <p>I want to send a big thank you to everyone involved in putting this incredibly detailed and carefully thought-out Plan together.</p>	<p>Upgraded government funding is likely to be available over the next year or so and it's to be hoped that the Parish Council will be able to access some of it. See Community Actions TP 1 – 6 and CA RHC 5 and 6.</p>
12 Ross Marshall	<p>Overall: This looks to me to be a splendid document and it has made me happier than I thought I was to live in the village. It is a worthy reminder of many of the advantages and privileges of living here. No wonder it is more desirable to move here than even many of the residents realise!</p> <p>Parts of the document seem to be ready made for use in a tourist profile of the village. Also, it is a useful reminder to those, who would change the village to fix today's temporary problems, that change should be done carefully so as not irrevocably to lose NB's character and heritage and also to prepare for a future where today's problems may no longer be relevant.</p> <p>1.7.1 I'd like to see the Parish Council work vigorously towards its stated aims in this paragraph in all its actions.</p> <p>2.5.6, 2.5.12, 2.6 I feel strongly about these points - that no new housing or other development should be made without thinking about the character of the village, the materials used (Appendix 1) and the critical parking issues. Anything which causes more demand for on street parking should be very actively discouraged, and I think document might want to make this point clearer.</p> <p>2.5.10 Good to see use of the phrase "cheaper housing" instead of the ill-defined "affordable housing" whose meaning is constantly changing. It is my contention that "affordable" actually means "subsidised" ie it benefits firstly the initial buyer/owner thanks to a public subsidy on the purchase price, and secondly it benefits the same owner</p>	<p>Thank you for your comments.</p> <p>In spite of reservations about parking, an increase in visitors to the village is welcomed as this will increase the viability of retail and hospitality businesses, the village hall and possibly the church. The village certainly appealed to visitors coming for recreational purposes during lockdown. A large influx of cyclists, walkers, runners – of all ages – came to take advantage of the local country lanes and footpaths.</p> <p>Implementation is the key, and this has been raised by other commentators. The wording of para 1.7.1 has been revised to 'reflects the community's wish'.</p> <p>The Neighbourhood Plan Working Party met with Highways Officers on three occasions and has kept in touch since. The officials responsible came to the village and were given a tour to make the situation clear. County Council budgets are particularly strained at the moment but this won't prevent ongoing discussions. The Parish Council intends to build on these relationships and keep up the conversation.</p> <p>The terminology is contentious and often loosely applied when discussing 'affordable housing'. Such housing is less expensive than the market price to buy or rent but the former is often only applicable to the first owner. The term 'affordable housing' promises much but in practice has proved difficult to achieve. The Parish Council has</p>

	<p>again when it's sold after 5 years at an unconstrained market price. If the village needs more "cheaper housing", it should be housing which stays cheaper.</p> <p>Appendix 2: This is an important summation of factors which will contribute to the quality human life and wildlife in our area.</p> <p>Final thought: This is a good document outlining serious considerations and plans to guide the future of the village. I hope and trust the PC, the Breckland DC, and the NCC have the determination to abide by it and require other parties to abide by it.</p>	<p>long recognised the need to ensure that there is a range of properties available for purchase or rental.</p>
<p>13 Gerry Walsh and Geoff Gildersleeve</p>	<p>We found the Plan to be most comprehensive not least in bringing together in one document issues and concerns which are and have been frequently discussed over the past few years, in a variety of forums in the village.</p> <p>Our particular interest is around development and action that can sustain the diverse New Buckenham community; supporting social cohesion through activities, events and engagement across all age groups for which the village is so well recognised. We also acknowledge and support the need to sustain its historic and rural identity while recognising the need for developments to keep pace with modern needs.</p> <p>As is recognised in the Plan, the type of housing and its development can either support or undermine the above issues.</p> <p>Comments on specific Policy Statements;</p> <p>Landscape and Heritage. We support policy statements 1 & 2. but policies 3 & 4 could lead to over restrictive interpretation.</p> <p>Countryside and Environment. We support all the policies in this section as well as the community actions suggested.</p> <p>Dark Skies and Light Pollution. We support all four policies and community action recommendations.</p> <p>Housing and Building Policies. While we support the policy recommendations as outlined and in particular policy 1 which supports a view that any future housing</p>	<p>Thank you for your comments.</p> <p>The Plan draws attention to the structure of the village in its open countryside setting that make it of national importance. Any policy has the capacity to cause difficulty if poorly or insensitively implemented. It's the hope of the Parish Council that the Plan itself will have a positive effect on community involvement in all different areas so that collaboration and agreement will be the watchwords.</p> <p>There is a measure of support within the village for small, less expensive housing and the Plan recognises this need. A key dilemma is how this should be achieved</p>

	<p>development should consist of smaller and more affordable dwellings we feel this could be expressed more strongly. (We feel that the comments in para 2.5.10 not only undermine this policy and infer , for instance, that residents who might wish to downsize should accept moving out of the community at a time when they might need it most. We feel that the last sentence is not an appropriate comment.</p> <p>Traffic and Parking. We support the first three policies in this section. In relation to policy four - car park, we think it needs further consideration of the impact of enlarging the car park given it will take up more green space and increase traffic alongside the play park. If the intention of increasing the size of the car park is to improve parking options for village residents, we cannot see this working as there is no evidence that this area is currently used to offset lack of parking outside people's homes. It may well assist visitors to the village.</p> <p>However we do not necessarily want to encourage people visiting the village just to walk their dogs on the common and surrounding green spaces. We are already seeing the impact of increasing dog walking, Certainly those of us who live near the green areas particularly near the car park and common including Tanning Lane are having to deal with increasing amounts of dog excrement left on the ground or placed in our domestic bins.</p> <p>As regard to community action, while acknowledging the parking difficulties many residents have with no parking space attached to their properties and the increase of households with more than one car, we personally feel there is an unrealistic expectation of some villagers that they have the right to park more than one car outside their own home. We should be encouraging more community/neighbouring cooperation tolerance and graciousness in this area. (nb. We are aware that street parking does help to reduce speeding within the village).</p>	<p>without compromising the unique character of the village. Thus the aim of LH3 and LH4, and other policies in this Plan, is to set out some key considerations that should be taken account of. These are not absolute; they are flexible guidelines against which future development proposals should be assessed.</p> <p>Since writing the first drafts of the plan, 'self-build' housing has come more to the fore and has a potential to provide lower cost housing. The Plan has been amended in the housing section to reflect this alteration and notes that the situation is currently under review.</p> <p>SURVEY17 reveals mixed feelings about increasing the number of visitors to the village. But more could be done to manage the throughput of visitors with better signage, particularly the village hall, shop, church, and to a village car park. 75% of respondents to SURVEY17 supported increasing the village capacity for car-parking by enlarging the car park adjacent to the play area. But there is space elsewhere too: on-road parking near the church, for example.</p> <p>Dog fouling in public places is a perennial problem and the Parish Council is constantly reminding residents and visitors of the need to clean up. New posters have been provided for the cricket pitch.</p> <p>Much could be resolved through neighbourly co-operation about the parking of residents' cars. The Parish Council has worked hard to foster this. See Policy HB2 and Community Action policies.</p>
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	<p>Business and Tourism. The only comments that we would like to make in this section are that the provision of an improved mobile phone reception should be a priority aim. We were very disappointed that a proposed mast at the bottom the village hall playing field was rejected several years ago. Unless some compromise is reached on the interpretation of "no harm to the natural, historic, visual environment" we cannot see how the village can ever achieve this priority aim.</p> <p>Recreation, Health and Culture. We support all policy statements and community actions. We think there should be some mention under community action of the need for more people to participate in both the planning and delivering of events and activities.</p> <p>We would like to suggest that there may be some future need and potential for extending the brief of the community car scheme.</p> <p>This is not least an aspirational document which includes many suggestions for maintaining and improving the village. To move on, what is now necessary is to pull together a realistic community action plan with the hope that more villagers will actively participate rather than seeing the responsibility for action lying elsewhere.</p>	<p>An effective mobile phone reception is a top priority and the current situation is a disappointment to many. The Working Party has been in continuous communication with Waldon, the mast provider for O2 and the only supplier in the offing. There were many objections to the village hall site originally proposed and the currently proposed site has run into legal complexities. However, these are commercial decisions and they move slowly. Despite best endeavours they are still unable to give a completion date. Please see the section on Community Action: Business and Tourism, CA BT 1 and 2.</p> <p>This is covered by Community Action CA RHC 5. The Community Car Scheme is greatly valued by users. The point about extending its brief will be put to the organisers.</p> <p>This Plan has several community actions formally listed. They are now summarised.</p>
14 Danny and Sue Williams	<p>We are very supportive of the New Buckenham plan as it stands and we believe it's been approached and delivered in a very measured and competent way. Of course there will obviously be more questions at a later date as government and local councils view certain aspects of the NBNP when they arise. We think a very professional plan was achieved by the village of New Buckenham.</p>	<p>Thank you for your comments and your support.</p>
15 Linda Bryan	<p>A zebra crossing from the village green in front of the market cross across to the Norwich direction bus stop area as a safety feature would be useful. Also a pedestrian pathway across said part of the green for people alighting at the bus coming from Norwich direction wishing to walk towards Queen Street. Especially useful in bad weather when grass may be wet, or covered in ice or snow and slippery. This would also preserve the grass from being trampled.</p>	<p>Thank you for your comments and the (new) suggestion about a pedestrian crossing and footpath on the Market Place. Advice would need to be taken from Highways, but there are issues of cost to the County Council's parlous budget and also having illuminated street furniture immediately adjacent to a Grade II* listed building in a Conservation Area. The Parish Council will discuss this further.</p>

	<p>I feel there is an urgent need for a section of the village green opposite St Mary's to be cut into to create a parking bay allowing free flow of traffic – especially for ambulances. Now that the August bank holiday fete is no longer held on that part of the green, surely this would be an asset and would not impact on any event.</p>	<p>Generally the Plan has Policies and Community Actions throughout to support better accessibility generally, Policy HB 4 and CA CE 4.</p> <p>The possibility of widening the road opposite St. Mary's Care Home has been looked into but the costs of doing so are prohibitive, without any clear expectation that the wider road would solve the access problem. The work would involve moving drains, a pole with overhead wires, and re-setting the kerb. There are also the considerable legal fees incurred, even if there are no objections. There would also be significant impact from encroachment on this village's historic centre, not to speak of the precedent.</p>
<p>16 J Anderson</p>	<p>2.6.14 Parking Extending parking Onto play area and cricket pitch</p> <p>Against this proposal reasons below: 1. This is part of the Conservation area - it is essential to maintain the landscape and use of this area as it helps to define the approach to the historic village of new Buckenham. Any further encroachment of vehicles and hard landscaping will be at the detriment of what makes New Buckenham a unique place to live and visit 2. Important open public green space which should be protected for the use of young people and residents of the village 3. Safety- any extension of the car park would bring vehicles closer to the area where children play 4. Potential damage to young trees which were planted provide a natural boundary to the new play area, to enhance the landscape and encourage wildlife 5. This is a rural location which would be further "urbanised" by further development. 6. Extending the car park would only encourage use of cars, whereas to improve footpaths and make safe cycle routes would encourage less need for vehicles to require parking in the village</p>	<p>Thank you for your comments.</p> <p>Your concerns are noted. The Parish Council believes that changes could be made to the car park without compromising the playground and its rural setting.</p> <p>See Community Action policies, CA TP 1 and the Parish Council will advise local people and businesses of their duty to protect and enhance the built and natural assets of the designated Conservation Area.</p>
<p>17 N Chirodian</p>	<p>General</p> <p>The Plan has been extremely carefully and thoughtfully written, and seems to have taken into account the prevailing views of many in the local community. There is a good explanation with historical context, of</p>	<p>Thank you for your comments.</p>

	<p>the situation that the village is in today, and a compelling case can be made not to support mass development, given the relative paucity of community and state services available locally. As far as affordable housing is concerned, I would remark that under right to buy, the housing will disappear into the free market within a relatively short period, as current government policy does not protect affordable housing stock in the long term in any case.</p> <p>Policy LH3: While it is reasonable that proposals should show awareness of historic boundaries within and around the village, it should not be a necessary constraint on future development that these features are treated in any special way. To set such a constraint would potentially limit opportunities for change in the village for several decades, in a futile attempt to maintain the past in perpetuity.</p> <p>CA CE2: The issue of the moat remnants is reasonable, but if there is to be any mandate to maintain or improve such areas, there will have to be some form of funding support provided in order to achieve this.</p> <p>CA CE6: There can be no expectation placed on private land owners to follow 'advice' provided without funding.</p> <p>CA DS5/6: There must be consideration of security and public safety overriding the requirement for dark skies for environmental reasons.</p> <p>Policy HB4: There is a large variety of construction styles and designs represented in the village, as a consequence of the evolution of building design over many centuries. There should be a willingness within the plan to welcome innovation in design in the future, particularly for environmental sustainability, even if such plans may not conform to 'traditional' architectural thinking.</p>	<p>Policy LH 3 is designed to ensure that whatever the village decides to do in future years, decisions are made in the full knowledge and awareness of the likely impact on historic village boundaries and quality of the settlement.</p> <p>Independent landowners will make their own decisions but our expectation (and hope) is that the Plan will provide essential information to guide future development proposals and support funding proposals to various bodies. The community mandate of a Neighbourhood Plan provides a good basis for a successful funding application.</p> <p>External lighting should not intrude into where it is not needed. Evidence that increasing external lighting has an effect on public safety is equivocal. See Steinbach <i>et al</i> (2015): https://jech.bmj.com/content/jech/69/11/1118.full.pdf</p> <p>The Parish Council welcomes innovation in new building of pleasing design that complements their surroundings. Good examples are illustrated in the Plan. The Plan provides a framework only and is sufficiently open to permit innovations.</p>
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	Policies TP2 & 3: I personally consider such interventions a waste of resources better spent elsewhere.	
18 B Chirodian	<p>Policy LH2, 3 & 4 I believe this is essential when considering any further development. We need to embrace and look after the history of New Buckenham and respect the historic character and countryside setting. It has survived since the 12th century, and I for one would like to see it continue to survive.</p> <p>Policy CE3 I am very supportive of ensuring that development does not encroach on SSSI's or common land. We have a duty to protect and look after these very unique habitats.</p> <p>CA CE 2 I would be very wary of any management plan that incurs continual financial support from the landowner. Private landowners should not be expected to follow any advice without external funding being provided.</p> <p>Policy DS 1 As long as there is adequate light to safeguard the public and properties, I support what the NP is recommending with regard to reducing light pollution.</p> <p>Policy HB6 If the village as a whole wants to encourage visitors and a greener environment, it would be in my mind essential to have an electric car charging point. The government has stated that it hopes to ban the sale of all diesel and petrol cars in 20 years.</p> <p>Policy TP2 I think that these are a waste of money as are "gateways". We already have a 20 mile/hour signs, Flashing "slow down" sign, natural bends in the road that reduce speed, narrow roads due to parked cars - and yet there is still an issue of speeding. Spooner Row has the narrowing of the roads at both ends of the village and speeding continues.</p>	<p>Thank you for your comments and support.</p> <p>Neighbourhood Plan support for local initiatives can be helpful in supporting funding applications to external agencies.</p> <p>The Government is making more funding available for the provision of charging points and it is clearly a vital part of the 21st century infrastructure. The Parish Council will do all it can to provide such a facility as it's increasingly appreciated that the future economic success of the village will depend on such basic facilities. Please see Community Actions regarding charging points CA RHC 5.</p>
19 F Thomas	<p>I am very impressed with this plan but want to make four observations.</p> <p>How do we get volunteers to do the community activities mentioned especially with the younger generation such as the youth club. I volunteered at the JAC youth</p>	<p>Thank you for your comments.</p> <p>Rallying residents to help is and has always been a challenging effort, requiring constant pleas and reminders. The Neighbourhood Plan reminds us all about</p>

	<p>club for many years, dashing home from work with no break from work to being a volunteer. It is really hard to get an equal spread of people to volunteer for all the various organisations and this then falls on a few villagers who find themselves being part of three or more village activities.</p> <p>The traffic is a real problem on the corner of King street and Queen street where my Mother (xxx xxx) lives. I note that the plan says there has only been one incident in 2014. My Mother's house has been hit a least twice, once by a drunken driver late at night and once recently by a tractor with a plough up on a trailer. The tractor took the corner too fast and the plough gouged out a cut at the bedroom window level on the house. This can still be seen as the insurance would not pay as we had no third party evidence of how this happened or who did it. Tractors in the summer come through the village much too fast, they do not stick to the 20 mile an hour speed limit. There have been a number of times when four by four cars park on the village green. It would be useful if there could be some electric charging points for electric cars possibly placed in the village hall car park?</p> <p>Well done everyone for putting this together and I apologise for leaving it until the eleventh hour for my observations!</p> <p>Further comments Landscape and Heritage I am very happy with this policy and pleased to see that contemporary design and materials as long as they are of good quality are to be encouraged. I like to see the old and the new side by side it gives a much richer landscape. I also agree strongly with LH4 about keeping the open aspect and landscapes around the village.</p> <p>Countryside and environment. I strongly support this aspect of the plan and feel we should do more to re-wild some of our areas and plant trees where we can. We need to bring local landowners on board with this as the village has few integral expansive wild areas. The designated green spaces are all managed and are for specific purposes. It would be good if we could join</p>	<p>what is necessary to keep such a village lively and enjoyable. The experience of the 2020 lockdown has shown the value of a close-knit and mutually supportive community which may act as an inspiration for future volunteers.</p> <p>Your concerns about traffic and parking are shared by many of the respondents. The Plan's recommendations combined with neighbourly goodwill go some way to ensuring that New Buckenham remains a comfortable and safe place in which to live.</p> <p>Please see Community Actions regarding Traffic and Parking CA TP 4,5, and 6.</p> <p>Notices have been put up on the grass asking people not to park. Yes, communal charging points are particularly needed due to the lack of private parking space. The village hall is a possible site as mentioned in the Plan. Please see Community Actions regarding Traffic and Parking CA TP 1-4.</p> <p>There is relatively little land under Parish Council control so the support of landowners is essential, together with a coordinated planting plan that includes trees, hedges and wild plants. Funding by the Parish Council and sponsors will be needed to support this. The support provided through the Neighbourhood Plan and referendum will assist in improving the success of funding applications</p>
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	<p>some of these up and boarder some of them where appropriate with more wild areas.</p> <p>Dark skies I am happy with this policy, though this may need to be looked at again if crime increases for local businesses.</p> <p>Housing Parking is my main concern. Many houses in the village do not have garages and therefore cars have to be parked on the road. The recent development of Lovells shop into two dwellings will increase the parking issues around the village green.</p> <p>Traffic and parking Many of the pavements around the village are parked on to broaden the road (Kings street) but this does make it very difficult to navigate a Wheel chair and a pram meaning often the pedestrian pushing has to take the vulnerable person/child into the road to walk.</p> <p>Business and Tourism I do have a business but I have not joined the Bizz Buzz group as my business is training and I do this all over the country. My main concern when working at home is mobile phone connectivity which is zero and very frustrating.</p> <p>Recreation, health and culture I am happy with this policy as it stands. My comments regarding the dearth of volunteers still stands as a lot of work falls to a very few people.</p>	<p>The Parish Council will discuss this further. This is discussed in para 2.5.12.</p> <p>Please see the response to this issue (above).</p>
20 Judith Kearney	<p>Firstly I should say that it is an admirable document as a guide to the perfect functioning of the village. Section 1.71 suggests utopian functioning but is it all within the capacity of the Parish Council? A recent planning decision on a busy corner presumably allowed an off-road parking space to become a terrace. Section 2.6.9 does not mention the Flexibus. My other comment relates to section 2.5 and the use of the census data on age distribution when a forward projection would have been possible with more useful grouping.</p> <p>I hope these comments are marginally useful to what is already a very fine document. I congratulate the team responsible.</p>	<p>Thank you for your comments. The Flexibus is mentioned in Section 2.6.3.</p>

21 Anon	I cannot see that any topics relating to village life have been missed. I liked the clarity of the language and the illustration-rich document makes it easy to read. The village now has a document that is a good foundation for considering the future development of the village. I like that the document helps us understand the roles and responsibilities of the Parish and District Councils. I also like the Community Action points, showing where the village can take responsibility for certain activities.	Thank you for your comments.
22 Terry and Fiona Jones	We have been regular visitors to New Buckenham usually twice a year for over thirty years. As a result we have a number of close friends in the village and take a close interest in village matters. We have read the Neighbourhood Plan closely and carefully and consider it to be thoughtful, thorough, balanced, and detailed. We are therefore in complete agreement with its conclusions and suggestions for action. Congratulations to all those who contributed.	Thank you for your comments. The village hopes to see you again soon.
23 New Buckenham Village Hall Trust	<p>General Overview</p> <p>The Trustees discussed the Plan at their last meeting and agreed that overall the Neighbourhood Plan was a positive step. The aims of the Plan which are most relevant to the Village Hall are:</p> <p>Enhance facilities to meet the wellbeing, recreational and social needs of all in the village (para. 1.7.1);</p> <p>Make a positive contribution to the social, environmental and economic functioning of the village (para. 1.7.1)</p> <p>However, the Trustees struggled to find any Community Actions or Policies which addressed directly either of these aims, nor how these might be achieved. The Trustees present at the meeting felt that there was a need for more direct guidance or direction as to how the Village Hall, having been identified in the Plan as a community amenity, might in the future adapt or develop in order to meet the aims set out in the Plan.</p> <p>It would be very useful to have access to the evidence base so that Trustees can make informed decisions about future developments at the Hall in order to meet the community needs identified in SURVEY17. For example, if there is demand for specific</p>	<p>Thank you for your comments.</p> <p>This information, including the raw data, is freely available in the Consultation Statement published as part of this Plan.</p>

	<p>recreational spaces, the Trustees would benefit from knowing this.</p> <p>It was also not clear what the rationale for the ordering of the policies in the Plan is, and why Recreation, Health and Culture are the last to be presented.</p> <p>Specific Comments</p> <p>Para. 1.6.2 The Village Hall is described as 'well used', but this does not convey the range and / or quality of the facilities available at the Hall.</p> <p>2.4 We have some concerns about the dark skies policies, both in relation to security in and around the village hall, in particular in the car park area, and in relation to lighting the village hall recreation ground. The Junior Football Club is one of very few thriving activities for young people in the village and the Trust feels that floodlighting the pitch will enable this to continue through the darker evenings. It also means that the pitch can be used safely for other community events late into the evening. However, this would contravene the dark skies policies.</p> <p>2.8 A distinction needs to be made between community assets and local businesses. The garage, the beauty salon, the pubs, the shop and the tea room are commercial enterprises. The church, the village hall and the children's play area are amenities. Conflating these presents a very confusing picture here. Surely different policies ought to apply to these two entities. They are subject to different pressures, management and planning law. For example, if we were to have no beauty salon this would have an impact only on users of that salon, whereas losing a community amenity such as the village hall would have a detrimental impact on the whole community, because the community amenities, rather than the local businesses are what allow community functions such as the fete, arts events etc to take place, creating that sense of identity and community spirit mentioned in 2.8.1.</p>	<p>The Plan was written in a logical progression, without implying an order of priorities.</p> <p>The Plan hasn't described facilities in other buildings but the reference to the Village Hall's facilities will be expanded. However the Plan cannot speak for the Trust which might consider using direct focus groups or consulting the village as a whole when planning to develop its facilities.</p> <p>With regard to security, the hall's external lighting should be changed from continuous bulkhead wall lamps to modern sensor-controlled downward facing lighting.</p> <p>Thank you for your comments about the Dark Skies policy particularly as it might have an impact on recreational activities, including the highly popular Junior Football Club. Section 2.8.6 (referenced from 2.4.3) now mentions outside recreation.</p> <p>Combining community assets and businesses is not helpful and this has been amended. The village's public amenities and businesses are all valued by residents to a greater or lesser extent. The box in 2.8.2 has been amended.</p>
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	<p>RHC CAs Why do we have actions for some community amenities (e.g. the church) but not others (e.g. the village hall)?</p> <p>RHC 1 Are the facilities currently on offer (e.g. the village hall) not suitable for these uses? Or is this really a plea for volunteers? It is currently unclear. Did SURVEY17 specifically identify a need for a 'youth club'? Younger people are choosing to socialise online or meet at one another's homes so this seems a rather outdated aspiration. If there is such a need, the village hall could provide a venue.</p> <p>RHC 2 Does this point actually relate to the village hall? If so, it would be helpful to make that explicit. If not, what does it mean?</p> <p>It would be helpful for the village hall to have a higher profile within the Plan and its policies. As it is arguably the major community amenity, it would be great to see some tangible policies and actions that the Trustees could work with and act upon. At a time when the Hall is considering future developments and how to meet the needs of the community, more evidence particularly in relation to wellbeing, recreation and social needs of the community would be extremely useful.</p>	<p>Recreation, Health and Culture policies were developed from the responses to SURVEY17 and the discussions that took place at the four focus group meetings held in 2018. The Village Hall was represented at the focus group for village organisations, clubs, charities and voluntary groups held at the hall on 5 March 2018. Suggestions about enhancing the role of the Village Hall were forthcoming at that meeting. These, and the reports from the other focus groups, were later displayed at the public meeting held in the village hall on 28 April 2018, one year after the project launch, and on the Plan's website: http://www.np4nb.online/open-day-one-year-on. This is all included in the Plan's Consultation Statement to be published on line when the Plan is submitted to Breckland Council.</p> <p>More use could be made of the open spaces in the village and the recently formed Village and Vestry group who have begun to use the church and churchyard for social activities is used as an example. There is scope for different groups to work together to maximise village facilities.</p> <p>The village hall is represented well in the Plan's description of village activities. This is illustrated in some of the posters on page 46, highlights the Village Hall facilities (page 56), equipment and hiring for external events serving the wider community such as Pilates, and page 59 highlights the role of the Village Hall as a hub for a wide range of cultural, sporting and social activities.</p> <p>The Village Hall Trust is encouraged to seek a higher profile in the village with more publicity given to its activities, finances and planning.</p>
24 M Womack	<p>I hope I'm not too late to send my comments after reading the fully published neighbourhood plan, but it would be inconsiderate of me not to do so, especially after all the hard intelligent work gone into producing such informative and well illustrated booklet.</p> <p>It's easy to read and gives a good idea of our village life past, present and future.</p> <p>I first came to this village, from France, in 1988 and after moving around, we</p>	<p>Thank you for your comments and support for the preparation of this Plan.</p>

	<p>established our family home here in 2006, after renovating our grade II listed property. It was hard work at the time but well worth the effort.</p> <p>The village community spirit has never failed to impress me and I can feel the passion about preserving such spirit while reading the neighbourhood plan.</p>	
25 PAO	<p>Beautifully presented and an accurate reflection of village views. My only criticism is that even more could be done to improve the environment and be Eco-friendly though that is probably a national issue. However small acorns grow into large oak trees given the right conditions. Should conservation of buildings be a priority in today's climate change? Solar panels and double glazing should be allowed on listed buildings.</p>	<p>Thank you for your comments. Historic England provides excellent advice about windows, please see https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/heag039-traditional-windows-revfeb17</p>
26 DC	<p>I consider the plan a triumph not only for the many volunteers who put it together but for the village as a whole. This plan will help shape the future of New Buckenham and its guidelines will be vital for future development.</p>	<p>Thank you for your comments and for support of the Plan.</p>
27 SP	<p>In general I think the Neighbourhood Plan is a very positive step for the Village of New Buckenham. It is good to know that until 2016 members of this community will be able to have some input in the way it develops and grows.</p> <p>2.3 2.5.14 Protecting the local countryside and the life that flourishes there is essential and I am pleased to see this in the plan. New Buckenham is more than just a collection of buildings, we have areas of outstanding natural beauty all around us which serve to enhance all our lives on a daily basis. I am pleased to see that the plan has taken into account wildlife habitats and that any future developments will be asked to contribute to existing green spaces.</p> <p>2.6 Traffic and parking continue to be issues for the village. I support the suggestions outlined that in the plan such as traffic calming measures and increase car park space.</p> <p>Overall I feel the plan highlights what a special place New Buckenham is, and how lucky we are to have it. Whilst we cannot preserve it in aspic we need to see it move forward in a way that the majority are</p>	<p>Thank you for your supportive comments.</p>

	comfortable with. This plan allows us to have a view and that can only be a good thing for everybody.	
28 Gill	<p>Just want to make some general comments. Firstly congratulations to all involved in preparing and creating the plan, for the excellent presentation and for keeping the village informed at the various stages of your progress.</p> <p>My main concerns are with the people less fortunate than ourselves who own our properties and acknowledging that, to move forward, we must encourage people of all ages and positions into the community. Historically we have looked after those less fortunate. We are lucky in having the Alms Houses, provided by a benefactor, but it does prove we have a history of thinking about the needs of all residents. The provision of affordable property to buy or rent is rather dismissed by mentioning there were facilities in neighbouring Old Buckenham, Banham and Attleborough. (p28/2.5.10) without thinking how, in the plan, we could AIM to make some provision in New Buckenham. I know we are not responsible for offering social care but an acknowledgement of an ambition to provide cheaper housing would help take the community forward as well as preserving the past.</p>	<p>Thank you for your comments.</p> <p>It is not our intention to dismiss the concept of affordable housing but as the Parish Council has already discovered this is difficult to achieve particularly for small scale developments. The village may have more success in encouraging the development of smaller units, rather than executive homes. These issues are explained in para 2.5.10. and in our responses to comments made by others (see above).</p>
29 Anon	<p>P15 CALH1 Policy HB9 The spider's web of overhead wires and poles spoils the visual impact in many of the streets. Could utilities be persuaded to put these underground?</p> <p>P26 Policy DS 1/2 Please could <u>all</u> street lighting be switched off at midnight? Some domestic 'security' lights are also very intrusive.....some are left on all night.</p> <p>P40 Better mobile phone provision is a must., and not an option in the 21st century.</p> <p>P36 and 42 CABT2 A car parking extension to the play area or other suitable available space is badly needed. Double roadside parking especially around The Green should be controlled for safety if no other reason.</p>	<p>Thank you for your comments. The utilities are private companies and independent of each other resulting in little or no liaison. The village has been successful in ridding King Street and some of Marsh Lane from overhead wires with visual benefit. Policy HB9 is against new overhead wires and poles in the village.</p> <p>There was a majority (47%) in favour of keeping street lights on all night when residents were polled in 2016. Intrusive lighting is addressed in section 2.4 of the Plan.</p> <p>Agreed, please see the responses above about this subject.</p> <p>A proposed extension to the playground car park is in Policy TP4.</p>

	<p>P35 Policy TP1 Road surfaces on lanes, roads and streets off the main B1113 are in a shocking state of repair. All need resurfacing.</p> <p>Policy 2.6.9 Is the provision of a discreet bus shelter for those waiting for a bus (even in a conservation village) something which could be considered?</p> <p>Thanks should be extended to all those who have worked on this excellent document for the benefit of the residents of New Buckenham.</p>	<p>The Parish Council notifies Highways of work that needs to be done. Unfortunately only basic repairs are done (by Highways) and the effect is sometimes short term. At the time of writing the Parish Council is informed that the whole of Marsh Lane is to be complete resurfacing Jan 2021.</p> <p>The Parish Council will discuss this further.</p>
30 Kirsten Kappler	<p>This is a very important document which has been long coming, but so well and clearly written, based on thorough research and consultation. <u>GREAT</u>.</p> <p>Page 15 and 25 Agree fully. Should not be necessary to have overhead lines and street lights on all night.</p> <p>Page 30. Housing. If any development is allowed to take place outside the 'boundary' e.g. old water ditches, it will <u>totally</u> and <u>completely</u> destroy this <u>very</u> unique village. Infill OK.</p> <p>I really hope this document will be accepted and adopted as it stands.</p> <p>Traffic and parking. This is an aspect that really needs to be addressed, and not just be the council.</p> <p>Page 42 Agree. Mobile phone? When? Deepest African jungle or impoverished India or in the middle of a vast Scandinavian forest receive mobile phone reception, but not here in UK.</p>	<p>Thank you for your comments.</p> <p>The Parish Council's survey of residents about street lighting in 2016 showed a preference (47%) for lighting to be on throughout the hours of darkness, albeit at reduced levels after 12 midnight. This has been implemented. The village 'wirescape' is unsightly. Please see our response to the previous comment (29).</p> <p>New Buckenham's Plan is a criteria-based Plan due to its status of being a planned mediaeval town that has been largely unaltered in size. Therefore new development coming forward can better respect this unique place through being properly assessed from a robust evidence base, that this Plan provides for the first time. Any new development coming forward can now be judged against the assessment criteria.</p> <p>Please see the response above to this issue.</p>
31 Alan and Jackie Edwards	<p>We would like to make the following comments with respect to likely future developments in the village. It relates to the onset generally of 5G networks in England which will affect all of us if the Government has its way. The</p>	<p>Thank you for your comments and the information you attached. Individuals' reservations about 5G are acknowledged but most national and international research finds no risk from the proposed levels of electromagnetic radiation. The</p>

	<p>microwave radiation which is utilised by this system was originally developed as a military weapon and is harmful to all life forms. It will impact disastrously on not just human health, but also wildlife/pets and even vegetation. A particular species at risk is the bee which is responsible for pollinating so many of our food crops. There are many, many websites on the Internet concerning this extreme threat to our environment; one which is particularly detailed is 5gexposed. We would mention that a retired government scientist by the name of Barrie Trower also has a very well informed website under his name in which he elucidates a great deal of information on this dangerous development. The general public are being kept in the dark about all of this partly because of all the money and profit which is generated by those companies tasked with spreading this effluvia over all of us.</p> <p>As newcomers to the village, we have been most impressed by its history and nature reserve. Limitations are already in place to protect this unique environment and we wish to see our environment further protected against the anti-life ravages which are part and parcel of this opportunistic and inopportune microwave scheme. It should be pointed out that there is a large body of scientific opinion from very many countries who are warning of this danger, and that so-called government reassurances as to the safety of this madness can easily be discounted.</p> <p>If other areas wish to allow this dangerous pollution to affect them, that will be their decision, but we would ask that New Buckenham is spared until proper evaluation has been made over a substantial period of time as to the effects of 5G elsewhere.</p> <p><i>Several pages of internet downloads were enclosed with these comments.</i></p>	Plan doesn't preclude accepting new research and legislation in the future.
32 National Grid	No assets	
33 Historic England	<p>Thank you for consulting Historic England about your draft Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We are therefore pleased to have the opportunity to review your neighbourhood plan at this early stage.</p>	Thank you for your comments.

	<p>Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers - regarding how the place should develop over the course of the plan period.</p> <p>Paragraph 185 of the National Planning Policy Framework (2019) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.</p> <p>It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.</p> <p>The conservation officer at Breckland District Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets. Although the neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below.</p> <p>The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section</p>	
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	<p>sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of New Buckenham. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.</p> <p>We are therefore please to note the inclusion of section 2.2 of your neighbourhood plan that deals with landscape and heritage. New Buckenham is a particularly special place, with a very high level of significance related to the survival of its castle and its magnificent earthworks and keep, but also manifested in the relationship between the castle and the village itself. The village contains many listed buildings of great interest, and its layout and plan form are also very important to the understanding of its history. It is of course designated as a conservation area.</p> <p>We welcome the inclusion of a suite of policies that aim to protect the village's historic environment, and the character of the village. Please note that policies need to be written with reference to the terminology found in the NPPF (i.e. heritage assets, harm, significance etc). We would make the following comments on the individual policies:</p> <p>LH 1: We are concerned that as presently worded, this policy could read as encouraging alterations to heritage assets. Whilst alterations to heritage assets are often possible, there is a potential that poorly considered alterations to a building to accommodate a sub-optimal use can cause harm to their special interest and significance. The NPPF requires that harm should be avoided where possible, and if it is not possible then it needs to be clearly justified by any public benefits. This policy therefore needs to be reworded to ensure that it is in line with the NPPF's requirement that heritage assets are conserved in a manner appropriate to their significance, and that any changes of use or alterations carried out are consistent with their</p>	<p>Thank you for your support for our approach in drawing up this Plan.</p> <p>These suggestions are helpful while noting that some alterations are beneficial and could be acceptable if harm is avoided. The text has been amended to do this.</p> <p>This has been reworded to clarify this point. We have now specifically stated that the policies in this section are based on the commissioned Landscape and Heritage Assessment.</p>
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	<p>conservation (see NPPF 184 and 185). Please also refer to Planning Practice Guidance Paragraph: 015 Reference ID: 18a-015-20190723 to advice on the optimum viable use of heritage assets, and to Paragraph: 020 Reference ID: 18a-020-20190723 for advice on what can be considered public benefits as related to heritage assets.</p> <p>Policy :LH2: We welcome this policy in general, but consider that it might be useful to incorporate the requirements in the Appendix into the wording of the policy, and to provide more detail in terms of the use of materials, layout, form and mass as policy, rather than supporting text.</p> <p>Policy :LH3: This policy is welcome. New Buckenham's grid pattern layout and the alignment of its town ditch is a key part of its character and significance.</p> <p>Policy LH4: We welcome this policy, as well as the supporting graphic in Figure 5. We would suggest that the word 'unacceptably' is removed from the final sentence. We suggest also that this policy includes a requirement for planning applications for new development to be accompanied by a visual impact assessment to an appropriate standard to demonstrate that important views are not compromised.</p> <p>The government's <u>National Planning Practice Guidance</u> https://www.gov.uk/guidance/neighbourhood-planning-2 on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a <i>neighbourhood</i> scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for</p>	<p>Adding the contents of an appendix into a policy would make the Plan cluttered and difficult to read.</p> <p>Agreed. Policy LH4 has been modified accordingly.</p> <p>Reference is made to Historic England's National Heritage List for England and most other places of importance are discussed in the Plan.</p>
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	<p>instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan, as you have with the key views. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</p> <p>The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/</p> <p>If you have not already done so, we would recommend that you speak to the staff at Norfolk County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (www.heritagegateway.org.uk http://www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.</p> <p>Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate additional maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire</p>	
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	<p>appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: http://mycommunity.org.uk/funding-options/neighbourhood-planning/.</p> <p>Your Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. Whilst the policies under Landscape and Heritage aim to do this, we suggest that a refinement of these based on a more robust evidence base - such as an appraisal document - would strengthen these policies and help them achieve their aim. If there is no appraisal document, policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: HE Advice Note 1 - conservation area designation, appraisal and management https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/, and here: https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.</p> <p>Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. Locality has produced helpful</p>	<p>No such appraisal document exists even though the Parish Council believes it to be essential.</p> <p>The designation of Open Spaces has already been done by Breckland Council and these are reiterated in this Plan. The Plan proposes designating Local Green Spaces.</p>
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<p>Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here:</p> <p>https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/. Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/</p> <p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets: https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:</p> <p>HE Advice Note 3 - site allocations in local plans: https://historicengland.org.uk/images-books/publications/site-allocations-in-local-plans/</p>	<p>Thank you, this is useful. This will be added to the list of resources at the end of the Plan.</p>
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	<p>books/publications/historic-environment-and-site-allocations-in-local-plans></p> <p>HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/></p> <p>We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.</p> <p>Finally, we should like to stress that this advice is based on the information provided by New Buckenham Parish Council in your correspondence of 3rd January 2020. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.</p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p> <p>Edward James Historic Places Advisor, East of England</p>	<p>A glossary has been included in the Plan but in view of these and other comments it will be revised. The Glossary has been revised.</p>
35 Richard and Alice	<p>Overall, the NP team is the be congratulated on having developed the Plan to this stage, and we are both very well aware of the amount of time and effort required to do so. It is also very pleasing to see that there has been a high degree of public engagement with the development of the Plan. As a family with young children and strong ties to the village, we are very supportive of many of the aims and objectives put forward in the Plan.</p> <p>Global: Church does not need to be capitalised when referring to the building, ditto castle and common.</p> <p>Para. 1.7.1. It would be useful to number these aims for the purposes of referencing. The use of 'without doing harm' is a little strong here, as it is a pejorative term, but also in planning terms 'harm' is acceptable when appropriately mitigated or outweighed</p>	<p>Thank you for your comments. You have mentioned typographical and formatting issues for which the Working Party is grateful. Where appropriate, such corrections have been made without commenting individually on them in this column.</p> <p>The aims are now cross-referenced with the policies. The text has been amended.</p>

	<p>by the wider public benefits of a scheme. Might it be more constructive to cast this as 'whilst conserving or enhancing' rather than 'without doing harm'?</p> <p>Maintaining public footpaths is already a statutory responsibility of the County Council and landowners, so perhaps does not need to be repeated at this level.</p> <p>Para. 1.10.1. While the definition given here is correct, an emphasis on conservation rather than preservation would read more positively here, particularly in relation to development.</p> <p>Para. 1.10.2&3. It should be made explicit here that New Buckenham (lie all Breckland CAs) has no CA Appraisal, nor has it ever had one, and that the specifics of the character and appearance of the CA or the rationale behind its boundaries has never been formally established.</p> <p>Para. 1.10.3. Has the CA boundary been amended since its designation in 1973? Figure 3 Has no OS copyright statement, only Historic England.</p> <p>2.2.4 'Historic' rather than 'heritage' buildings please!</p> <p>2.2.8 The use of 'constraint' to describe Heritage Designations sets the wrong tone here, although we appreciate this is reporting the opinions expressed (we would say wrongly) in the Survey. Perhaps this could be more closely linked to 2.2.9.</p> <p>Policy LH 1 We support the sentiment of this Policy, but the way it is currently expressed makes it almost incomprehensible.</p> <p>Policy LH 2 Again we support this. In planning terms 'enhancement' is the concept here, rather than positive or harmful.</p> <p>Policy LH 3 Does 'respect' in this context mean 'stay within'? This seems to be the implication, but is not the historical reality on the ground (cf the Heritage Report).</p> <p>Policy LH 4 Are the views in Figure 5 (this should say Figure 6) the only views or re they example views?</p> <p>CA LH1 Community Action numbers need to not repeat the LH 1, etc., to avoid a perception of linkage between the Policy and the Community Action.</p> <p>Are there no other heritage or landscape CAs which might enhance the village, i.e.</p>	<p>It may be the responsibility of the County Council and landowners but the Parish Council still has to alert them or remind them of their responsibilities. The text has been altered but the point made has been retained.</p> <p>This has now been made clear.</p> <p>No it hasn't.</p> <p>'Constraint' is the correct word to use.</p> <p>Sentence rearranged, especially following the comments of Historic England above. Text amended.</p> <p>These are leading examples of views over land surrounding the village that particularly illustrate the boundary between the built-up area and boundary. These are therefore illustrated but there are others. This has now been made clear.</p>
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	<p>cleaning out the moat, clearing the Orlit post, maintaining and repurposing the Grade II listed phone box, etc.</p> <p>Heritage-related findings should be reported to the Norfolk Historic Environment qRecord. Figure 6 These should perhaps couched as example views, rather than definitive views, as there are others. Perhaps these need to be assessed on a case-by-case basis using the criteria in LH 4. Not sure that I agree.</p> <p>Section 2.3 Need to define the difference between Landscape in 2.2. and Countryside and Environment here. Do you mean ecology here?</p> <p>Para. 2.3.8 Biological records are held at County level by the Norfolk Biological Information Service, so Breckland will not hold such records and shouldn't be expected to. The NBIS is not 'sketchy', but does rely on sightings being reported, so a CA should be added here to encourage the reporting of such things.</p> <p>Para. 2.3.9 None of the heritage and landscape reports are summarised in this way, and many of the statements made here are a) unnecessary and b) inaccurate, especially regarding the longevity of bat surveys in the county.</p> <p>Para. 2.3.10 Rather than moaning, might it be a CA for the spotters to report these observations?</p> <p>Para. 2.3.11 Citing the NPPF here highlights that it hasn't been cited in the heritage and landscape section, when it could have been.</p> <p>Para. 2.3.15 Does the Plan reiterate designations already made in this fashion?</p> <p>Policy CE 1 Ecology surveys are fairly standard for planning apps, but they are dependent upon sighting being reported (as above).</p> <p>Policy CE 2 Cuffer Lane is surely a road, not a green space, ditto Market Place, where only the grassed areas are 'green'. Is the common not a green space or the surroundings of the castle? Do these need to be public spaces? The definition is not clear.</p> <p>Policy CE 3 Development should not be refused on these grounds, rather the harm caused needs to be weighed against the public benefit, as per the NPPF. Also, why single out the castle and the common here, when both have been subject to development already.</p>	<p>It should be noted that the telephone box structure is owned by British Telecom but the telephone is non-functional. Emphasised as a CA.</p> <p>See response to Policy LH 4 above.</p> <p>There is overlap in the semantics.</p> <p>The NBIS gives an incomplete picture due to the lack of reporting due to lack of awareness and, at the time of writing, is not easy to do. Community Action added.</p> <p>"For the first time in village history" deleted but otherwise leave unchanged as there appears to be nothing contentious with para 2.3.9.</p> <p>CA added to this effect.</p> <p>There are already several references to the Breckland LP. NPPF references to Section 2.2 added where important.</p> <p>This section has been revised.</p> <p>See above for 2.3.8.</p> <p>See above for 2.3.8. This section has been rewritten.</p> <p>References to castle and common deleted, wording changed to 'should not be supported'. N.B. Castle and surroundings are not in New Buckenham although are part of the Plan's designated area.</p>
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	<p>Policy CE 4 Sustainable living is already compromised by the fact that the village cannot be reached easily by public transport and lacks amenities (c.f. Para 1.5.3).</p> <p>The provision of grants to plant trees should be struck out. While the aim is laudable, the funding of this should not be tied to the Plan or be in the gift of the PC. No similar provision is suggested for moat management, listed building work, solar panels, etc. Would not a mention in the Plan reinforce the need for PC to identify a budget for this?</p> <p>CA CE 6 Such information is already widely available already and should be publicised.</p> <p>2.4.3 We agree that dark skies are good thing. The plan doesn't control anything outside the Plan area. Why single out farm and commercial buildings here? There are plenty of offenders within the village, too.</p> <p>DS 1 The Plan area is fundamentally not an unlit environment. An enforced switch off of security lighting undermines the point of a deterrent.</p> <p>DS 3 How is 'only when needed' being used here in relation to earlier comments, i.e. security and public safety?</p> <p>DS 4 From a security point of view, this is not a reasonable policy.</p> <p>There needs to be an acceptance that lighting for recreational purposes, i.e. pitches and playground, may be more desirable and might conflict with these policies.</p> <p>CA DS 5 This numbering here is continuous unlike other CAs.</p> <p>CA DS 6 What counts as public or private premises in this context?</p> <p>2.5.2 There are quite a lot of exceptions to development outside the boundary to the west, south and east, including most of Marsh Lane.</p> <p>2.5.11As several recent builds have shown, infilling is the best way to expand the village, and this has been undertaken for my centuries. It is part of the historic character of the village.</p> <p>2.5.14These issues are already dealt with in the NPPF and are balanced against public benefit.</p> <p>2.5.15Do the PC really have the capacity or desire to be involved in pre-application discussions of this kind to this level of detail? Does the PC have policies or expertise of its own to make consistent and meaningful comments?</p>	<p>The Parish Council's community fund is available for small projects and has already provided funding support for tree planting. This can be used for other environmental projects.</p> <p>CA now mentions links to such information from village websites. This is referred to in CA DS 5,6 but the text has been reworded.</p> <p>Modern sensor-controlled lighting is favoured for security purposes. DS policies modified to make this clear. It is already mentioned in CA DS 5.</p> <p>There is little evidence to support continuous lighting as a crime deterrent. Commercial premises that use it merely add to light pollution in their surroundings which is always undesirable, and wastes energy. Sensor controlled lighting is acceptable.</p> <p>Section 2.4. amended to mention outside recreation. The CAs have been modified to apply to private and public premises equally.</p> <p>NPPF referenced.</p> <p>The Parish Council does have a role to play, not least because it will have a resource in this Plan. There is no reason why Parish Council should not discuss applications at a preliminary stage, if consulted. This Plan sets out a framework for discussion.</p>
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	<p>HB 3 Businesses can and should close if they are not commercially viable. This must be a commercial decision for a business owner to make. Change of use is already dealt with under planning policy at District level and strong evidence is required.</p> <p>HB 5 There are no existing cycle routes (apart from the roads!) and basing new development on pedestrian and cycle access only is not sustainable in this location under the NPPF. Public transport is clearly insufficient, and there are not the amenities for residents to rely wholly on foot and cycle transport.</p> <p>HB 6 We do not have buildings of local merit – there is not a Local List for this area and no Conservation Area Appraisal which might identify buildings that contribute to the character of the Conservation Area.</p> <p>2.5.20 This visual is very attractive and useful, but could be expanded and the individual images made larger. This is the sort of thing that is really useful in practical terms when thinking about good design.</p> <p>2.6.5 This should also include cars and farm vehicles as these do regularly use Cuffer Lane, even if we would rather they did not. Looking at it from the opposite perspective, it provides a route out of the village to access the agricultural land, and a safer cycle route through to Old Buckenham.</p> <p>2.6.6 This overlooks the issue of the expansion of the King's Head, and the parking of patrons. Parking in this location is a significant issue, but this is far worse during busy times at the King's Head. It is not only emergency vehicles and bin lorries that cannot pass through the west side of Market Place due to parked vehicles, but also normal-sized cars struggle to negotiate double-parked vehicles in this narrow street.</p> <p>2.6.7 This is a significant issue, and there should be a Community Action to remove all obstructions from the pavement. This should be applied equally to commercial premises and private residences, making the pavements passable to all. Clutter also includes seating and tables, swing-signs and waste bins, all located on the pavement. There also needs to be a community action about wheelie bins being permanently located within the public highway.</p> <p>TP 2 Surely this isn't a policy, but an action? How does the introduction of a flashing speed sign sit alongside the policies about reducing street furniture? Has the visual impact of this been adequately considered?</p>	<p>Changed HB 6 to 'neighbouring buildings'. This emphasises the need for context drawings with proposals.</p> <p>Leave unchanged.</p> <p>Text revised.</p> <p>Please see responses to comments made above.</p> <p>The Parish Council is well aware of these issues. CA added to this effect.</p> <p>Changed to a CA.</p> <p>Changed to a CA.</p>
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	<p>TP 3 This doesn't sound like a policy either – surely this is an action with an associated one-off cost, and once done will be of no relevance to future planning.</p> <p>TP 4 This doesn't sound like a policy – again, it is an action which, once taken, will be of no further relevance to planning. Aside from drainage issues, surfacing and some sort of thought to layout and use is required – at the moment there is often a lot of unusable space in this car park because parking within it is rather 'freestyle'. Several spaces are used by local residents and businesses so any expansion needs to take this into consideration.</p> <p>Surely the huge section on traffic and parking where nothing is enforceable ought to include far more Community Actions. For a start, there needs to be more publicity around considerate parking, targeting users of local businesses as well as local residents. Greater consideration needs to be given towards the reduction of clutter on pavements and in the highway. All pavements should be clear of overhanging plants, planters, wheelie bins, signage and other nuisance items.</p> <p>What about potholes? Building projects should be undertaken with consideration for those using the road network so that junctions are not blocked, roads are not informally closed and skips are not placed dangerously.</p> <p>2.7.3 Surely shop singular rather than plural?</p> <p>2.7.9 Although Attleborough is growing, why identify this as the main source of tourism? Surely we want to appeal to those from further afield so that they have to avail themselves of local businesses such as the pub and shop?</p> <p>There ought to be efforts to better New Buckenham's tourist 'offer'. For example, if we are a 'heritage' destination, we should be highlighting our heritage assets with some good information (perhaps online) for people wishing to visit. We should also work with owners of heritage assets to provide better public access, whether via 'open days' or similar schemes or through open access. If we want visitors, there needs to be enough for them to come and enjoy, otherwise they won't come again!</p> <p>BT 2 This policy name is confusing and reads oddly. Isn't this issue already dealt</p>	<p>Changed to a CA.</p> <p>Added CA.</p> <p>The Parish Council is very active about potholes and, thanks to the assistance of our County Councillor, repairs are undertaken within a reasonable period.</p> <p>Trading is done also from Bakehouse Cottage. Changed 2.7.9.</p> <p>This is being done currently with the parish notice board display, hopefully with the same material available on village websites and printed material. We think many in the village already work hard at attracting visitors through Open Gardens and arts events. Heritage is another venture and volunteers will be sought to continue the New Buckenham Society's efforts in doing just that.</p> <p>Issue has been highlighted. BT 3 reworded.</p>
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	<p>with at district level via the normal planning process?</p> <p>BT 3 The parish council does not grant planning permission, so they can either support or not a proposal, but they cannot refuse it.</p> <p>CA BT 2 This replicates policy TP 4, see above.</p> <p>CA BT 3 This would only work if there is more on offer for visitors, see above. Key assets such as the castle need to be open, signposted and interpreted if we want visitors to come here.</p> <p>2.8 A distinction needs to be made between community assets and businesses. For example, the garage, the beauty salon, the pubs, the shop and the tea room are commercial enterprises. The church, the village hall and the children's play area are amenities. Conflating these presents a very confusing picture here. Surely different policies ought to apply to these two types of entity. They are subject to entirely different pressures, management and planning law. For example, if we were to have no beauty salon this would have an impact only on users of that salon, whereas losing a community amenity such as the village hall would have a detrimental impact on everyone, because the amenities, rather than the businesses are what allow community functions such as the fete, arts events etc to take place, creating that sense of identity and community spirit mentioned in 2.8.1.</p> <p>RHC 1 Surely opening hours are a commercial decision and should not be enshrined in policy. These ought to be considered each on their individual merits, and take into consideration other concerns such as the impact on neighbours, parking, etc.</p> <p>RHC 2 It is unclear what this policy is referring to or anticipating. If, for example, there was a proposal to develop a community asset to rival one already in existence, e.g. a new church or a new village hall, would it be supported? Surely this is where we ought to be focusing on enhancing and developing amenities that we already have to maintain their currency and ensure that they remain fit for purpose. This is where clearer links to actual amenities ought to be explicit and would be helpful.</p> <p>RHC 3 This seems to combine three policies, one of which is very similar to RHC 2 (see comments above). The Plan again</p>	<p>As mentioned in the response to the Village Hall Trust section 2.9 has been reworded to make the distinction clear. It is pointed out that village or visitor users of these facilities do not see such distinctions, rather that they see the facilities as a whole adding to the village's attraction.</p> <p>No change.</p> <p>No change.</p> <p>Wording changed.</p>
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	<p>refers to ‘permitting’ rather than ‘supporting’ but will not be used to permit or refuse planning consent.</p> <p>CA RHC 2 Do we need to make reference to V&V here? It’s great that they are doing what they are, but couldn’t this be a wider plea for other groups/individuals to also make use of these spaces?</p> <p>CA RHC 3 There are already measures in place to ensure the maintenance of footpaths. Surely the Parish Council does not want to enshrine any such obligation as a community action as this would allow the county to cede responsibility. The action about dog waste bins should be separate, and is arguably something that the Parish Clerk should do, and the community action should be to use the bins provided!</p> <p>CA RHC 4 Mention the Parish News by name since it already exists, and is partially funded by advertising and sponsors (not by the Parish Council). Check the grammar of the final sentence of this action.</p> <p>CA RHC 5 This scheme should have higher status within the Plan, and should be explicitly mentioned as an amenity earlier in this section.</p> <p>It feels as though there ought to be some sort of conclusion to this document to complement Karen’s excellent introduction. At the moment it stops rather abruptly. Appendices shouldn’t be Section 3 as they’re appendices.</p> <p>Building Design Checklist</p> <p>3.1.3 Remember that part of the Plan area straddles Old Buckenham parish and therefore that New Buckenham Parish Council may not in fact be a statutory consultee on all applications within the Plan area.</p> <p>3.1.5 ‘respected’ rather than ‘preserved’.</p> <p>3.1.6 This is a laudable aim but it’s hard to see how this has been arrived at and what evidence supports this proposal. There is little mention of this elsewhere in the plan.</p> <p>3.1.8 This appears to replicate 3.1.4</p> <p>3.1.9 ‘complement’ rather than ‘be in harmony with’. Bullet point four repeats 3.1.7. Bullet point five repeats 3.1.6 and is not a design issue. Bullet point six – as stated above this should be a more generic statement about impacting on views rather than on a definitive list of views as set out in the plan.</p>	<p>V&V is the current focus for these activities but these spaces have also been used by other groups such as the Players and New Buckenham Society.</p> <p>This is a reference to sources of information other than Parish News that have the advantage of immediacy and a different user age group. It is pointed out that other ways of communication are not funded by Parish Council either.</p> <p>No change as none of the lists should be considered displayed in order of importance.</p> <p>Afterword has been added.</p> <p>The Parish Council is well aware of this. In practice the two parish councils do liaise with each other about such applications and other matters.</p> <p>Now combined.</p>
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	<p>Green Living Plan Checklist</p> <p>4.1.2 Numbered bullet points are great, and would be helpful in previous sections. Point 9 contradicts an earlier stated preference for walls rather than fencing. Points 10 and 11 are far too specific – we shouldn't be specifying species.</p> <p>The Glossary is very fulsome and seems to include a lot of terms that are rarely used in the report.</p>	
35 C Stimpson	<p>1. This is my response within the consultation about the proposed Plan "the proposal". I have copied this letter to the Breckland Council Monitoring Officer because some of the points are a complaint about the Parish Council.</p> <p>2. The Parish Council "PC" collectively has a duty to champion the needs of the whole community equally and anybody who may be affected by the proposal; it remains responsible throughout for the proposal.</p> <p>3. The proposal is a plan that would be binding for a very long time, until at least 2036, and pretty well impossible to alter. In that time our living circumstances and needs will change enormously. Those in the future of the area affected will not thank today's community for a plan that restricts decisions in ways not yet foreseeable. My overall view of the draft is that it binds the current and future as yet unknown community far too tightly.</p> <p>4. It potentially empowers people who are not yet part of the community. It could actually discourage people from coming into the community in the future if the plan area is seen as over controlled and too expensive. Taking care of the village and surroundings is a very worthwhile intention but the proposals go too far in seeking to fulfil that aim.</p>	<p>1. Thank you for your comments. Some of your response is a formal complaint that has been dealt with elsewhere.</p> <p>3. A neighbourhood plan is a framework document that outlines the residents' aspirations for their village until 2036. It is not "impossible to alter" and indeed the Parish Council will review it at least every five years to ensure that the policies are delivering the intended outcomes and to reflect any changes to the planning authority's Local Plan which may need the Plan itself to be modified. (Neighbourhood Planning guidance: Paragraph: 084 Reference ID: 41-084-20190509). Government guidelines make it clear that although a neighbourhood plan has legal status, it exists to work alongside the District Council's Local Plan and does not have priority. Where there is contradiction S 38(5) Planning and Compulsory Purchase Act 2004 stipulates the conflict must be resolved in favour of the District Council's local development plan.</p> <p>4. Do you mean 'disempowers'? Policies could be prescriptive or obstructive if they are not well and sensitively implemented. The function of the Plan is to offer the guidelines sought and supported by the majority. It is up to the Parish Council in its role as the people's representative body to ensure that the guidelines retain their contemporaneity for at least two decades.</p>

	<p>5. Scope of consultation</p> <p>6. The PC allowed a survey that excluded those responsible for 90% of the area affected. Until the survey took place there was wide publicity stating that a survey would happen and everybody would have a chance to put their views.</p> <p>Neighbourhood Plan = 'Neighbourhood', not just the village. Nothing was said to explain that in fact, when it eventually took place, the survey would only allow selected participation. A portion of the community that has become referred to as The Landowners found without prior notice that they had been excluded from the survey and prevented from participating in it.</p> <p>7. The PC's letter to me [23rd September 2017] confirms, amazingly, that the decision to exclude a portion of those affected was intentional.</p> <p>8. It was clear that at the time of the restricted survey, the PC had not even compiled a list of who should be canvassed. 'Results' of the survey were even published, and yet those responsible for 90% of the land area affected by the proposal had not been identified or contacted at that time at all. The opportunity to include everybody was missed and that avoidable exclusion has created ill feeling.</p> <p>9. I am attaching a re-print of the Survey17 "S17" questionnaire and for comparison the questionnaire that was eventually circulated to landowners in October 2018, about</p>	<p>5. In preparing the Plan the working party (and through it, the Parish Council) has been guided by the legislation and regulations, a range of national guidance and has taken advice from officers of Breckland Council, Locality (the national advisory body), as well as a number of specialists and experts in various fields including experts in surveys, structures and public involvement strategies. There is nothing in the legislation or regulations to say how a Parish Council should produce a Neighbourhood Plan other than whom to consult and the statutory documents that need to be submitted to the Local Planning Authority, such as a map or statement which determines the Neighbourhood Plan area.</p> <p>6,7. The questionnaire (SURVEY17) was specifically for residents as it largely covered matters of importance to residents only. Local landowners were given the opportunity to get involved with their own later questionnaire that asked about matters of specific relevance to them. This included the open question: "Are there any other issues you believe should be considered in planning New Buckenham's future?" Landowners have had every opportunity to make their views heard. In preparing the Plan the working party (and through it, the Parish Council) has been guided by the legislation and regulations, a range of national guidance and has taken advice from officers of Breckland Council. Furthermore it took advice from specialists in conducting surveys and public engagement.</p> <p>8. A project such as this needed to be taken in stages. Interested parties other than residents have not been disadvantaged by being surveyed at a separate time or, in the case of landowners, by using a survey more specific to their status and interests.</p> <p>9. Every landowner was surveyed other than the owner of a small field who could not be identified. A landowners' meeting had been planned, as recorded in the</p>
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	<p>eighteen months later. This following proposals stated in the working party's minutes dated 16th January 2018 that it <i>"felt it was unlikely that representatives of this stakeholder group [Landowners] would be available to come to a meeting in the village"</i>. They were never asked. Several of them were never even found. This further demonstrates the vastly reduced involvement allowed for the landowners. Quite a few live not far away or like me are in the village often.</p> <p>10. There should never have been a situation where those responsible for such a large proportion of the area affected were treated separately as 'The Landowners' and secondary consultees, all 'those potentially affected' ought to have been included in S17.</p> <p>11. The restricted/ invited survey, S17, for completion by those responsible for about 10% of the area affected, contains over 30 questions, offering multiple choice options for expressing views and opinions on a broad range of topics, whilst the landowners, responsible for 90% of the area affected, were asked only four short questions, seeking information about their affairs with only two of those offering scope for expressing other views and opinions.</p> <p>12. On 5th November 2018 the PC wrote to me and stated that the legislation is such that only those registered to vote in the area affected by the proposal, are entitled to vote in an eventual referendum. In the circumstances that is the case then surely the PC could have taken even greater care to ensure the equal and simultaneous inclusion of everybody, whether entitled to vote in a referendum or not. That would have shown an inclusive intention from the outset and a greater chance of the whole community being agreeable to the outcome.</p> <p>13. In fact, the method adopted seems to have prioritized the interests of somebody who for example rents short term accommodation in the village and registered on the voters role, over and above the farmers and landowners who in many cases have several decades of involvement with the area. There should have been no prioritizing at all. Somebody renting a home</p>	<p>notes of the meeting on 12 December 2017, but in light of the comments received from the landowners in their survey it was not felt necessary to arrange it.</p> <p>The neighbourhood plan project was launched with much publicity and in the local press. News about the project continued to be made available in local printed material and online to which all with an interest in the village had access. The Parish Council was pleased you were able to attend the two open days.</p> <p>10,11,12,13. The Parish Council does not believe that it has acted in a way prejudicial to any of the interested parties. As mentioned in (9) above, all interested parties other than residents were consulted including landowners, with the exception of the owner of a small piece of land who could not be identified. SURVEY 17 was about the aspirations and quality of life of people resident in the village. There is no resident population in the land surrounding the village to which you refer and SURVEY17 was therefore inappropriate for landowners. The process of consultation will be described in the formal Consultation Statement that will accompany the Plan when it is submitted to Breckland Council.</p> <p>A person is entitled to vote if at the time of the referendum, they meet the eligibility criteria to vote in a local election for the area and if they live in the referendum area. The voting legislation is set centrally, by the Government and monitored by the District Council. It is not set or influenced by the Parish Council.</p>
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	<p>for a few months who might have moved on anytime, (S17 was nearly three years ago) or who has only recently moved into the village, has been offered greater input to the proposal, which concerns my land, than I have!! There is at least a three year gap between S17 and any chance of a referendum! Some referendum participants, should one eventually take place, will not have taken part in S17.</p> <p>14. S17 includes a number of questions that are obviously to do with the land and its use, and yet the PC chose to exclude the owners of that land from setting out their views at the same time and in the same way. No farmer or owner of land in the proposal lives in the plan area, the farmer's commercial knowledge of the countryside as a living agricultural workplace, will likely be entirely different from those who were allowed to complete S17, who are clearly invited instead to express more leisure based views of the proposal area outside the built village. Their focus of interest is very different. They were even invited to express views about what sort of crops might be grown!!.</p> <p>15. Many of the questions in S17 can be read as leading. I understand there was no independent review of S17 before it took place. Particularly leading are a number of the questions about land use and countryside. Had those who own and farm that land been fully included from the start, (and/ or had their promised Focus Group) the outcome might have been different. The proposals seem oblivious to the challenges faced by farmers and landowners.</p> <p>16. Several of the landowners I have spoken to had never heard of the proposal until I told them about it in late 2018. By contrast those invited to participate in S17 were notified by village publicity, posters, and so on. The February '20 Parish News states a copy of the draft was delivered to every household but none was provided to the landowners who appear to have been excluded from the consultation (which will affect their land i.e. 90% of the land area of the proposal) unless like me they happened to see the release mentioned in the Parish News and go to the open morning to obtain a copy. This is a further example of the sidelining of the landowners interests. Which may not comply with the requirement that 'everybody is kept</p>	<p>14. Views from residents were sought on general aspects about land use as there is considerable local interest in the village's surroundings. Residents were not asked about crops other than in the context of energy generation issues.</p> <p>15. Please see our response to point 5. The Working Party had continuing advice from experienced officers of Breckland Council. For SURVEY17 advice was taken from Vance Associates, an international company that specialises in surveys and focus groups.</p> <p>16,17. Please see our response to point 6.</p> <p>17. The entire process was conducted under strict rules of confidentiality and in conformity with GDPR when it was introduced. The views of landowners, where expressed, have been kept confidential.</p>
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	<p>fully informed of what is being proposed'. It is well known that several of them live some way away and, obvious by their exclusion from S17, none of them live in the village.</p> <p>17. In my reply to the land owners' consultation, copied to every PC member, I asked if a representative of the land owners, being 90% of the area affected by the proposal, could be appointed onto the working party, this might have gone some way to address, even at that late stage, the chasm between S17 and the landowners involvement. I had no reply. This appears to be non-compliant with the requirement that the 'wider community....has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order', which is not the same as being allowed to review the draft later on. The landowners were not afforded the anonymity offered to others.</p> <p>18. It would have been perfectly possible to first of all establish a list of those who would be affected by the proposals and only then survey them all at the same time, irrespective of the residents only being eventual voters. Instead the decision to treat separately those responsible for the land in the plan as merely 'other consultees' unfairly excluded them. The PC could have avoided any difficulty by adopting a different approach but chose not to. S17 seems to have been undertaken prematurely.</p> <p>19. The PC did not require any formal external advice at the outset. Only on 12th December 2017, several months after S17, was an adviser introduced. A note of that meeting states that the landowners would be treated as a Focus Group. In fact this never happened and landowners were not contacted at all until 30th October 2018. If they had been included in S17 they may not have needed a Focus Group anyway.</p> <p>20. The shape of the village and its heritage.</p> <p>21. The draft proposal explains the view that the village is a well preserved ancient settlement, reflecting its shape as originally brought about in the 1200s. It evidences the Town Moat as an important aspect. The well-known work of the late and respected Paul</p>	<p>18,19. Please see our response to point 9.</p> <p>20. Attention is drawn to the Landscape and Heritage report commissioned for the Plan, available to view online.</p> <p>21,22,23. While acknowledging the work of Mr Rutledge, the Parish Council is confident that the Heritage and Landscape Assessment commissioned from a professional archaeologist represents the most up-to-date knowledge on the subject.</p>
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	<p>Rutledge is mentioned. In fact however, Mr Rutledge's work also states that the alignment of the Moat is largely speculative and assumed. He also mentions there is very little documentary evidence of the early settlement.</p> <p>22. The draft states [para. 2.5.2] that development has been within the Moat with few exceptions, however, my research, already on public record, (Selby 2016) shows that over 64 houses are on or outside the assumed line of the Moat. The draft mentions 209 households [2.5.2] so it seems that in fact as many as 30% of the current dwellings, some several hundred years old for example the Vicarage and Thatched Cottage, are on or outside the assumed alignment of the Moat!!</p> <p>23. Mr Rutledge's work also mentions that the moat was being ignored and filled in by the 1600s and consent was given for a barn to be built on it [Gosling] in 1630. Also, take up of the land in the moated area was actually quite slow, and the land to the North West corner including that now occupied by St Martins Gardens was never built on at all. Its occupant was sanctioned for the derelict state of it at one time. It was a vacant meadow until 1963, by which time it had been ceded back to Old Buckenham. Early New Buckenham never extended to fill it and it only later became within New Buckenham parish by a subsequent re-alignment of the parish boundary, (1960s).</p> <p>24. Pevsner (1962, almost 60 years ago) mentions 'This little town has preserved its layout' and goes on to describe the street alignment but not, as often claimed, the overall shape and size of the settlement. In the many years since much more building on the perimeters has taken place. Selby's report of 2016, details mapping and growth that confronts the wide belief that growth has not taken place. I wonder how many of the people who believe that, have ever looked at the information in any detail?</p> <p>25. My point here is that one can read the historical information to produce an outcome favorable to a range of circumstances and it is risky to claim as a defining fact any one of these various interpretations of the available material. With that in mind the draft should be amended, because that aspect is a major</p>	<p>24. Pevsner's remarks and the report privately commissioned from Selby were reviewed during drafting of the Plan.</p> <p>25. The Plan reflects a range of views, in the context of the environment and nationally important heritage within the Plan's designated area.</p>
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	<p>foundation of the growth and development restrictions that the draft ultimately seems to me, to prefer.</p> <p>26. There are important heritage features but they could be at the central focus of a village where some further growth is allowed because without it the village may become 'A pretty, historic, dead, monument' [a speaker at the 19th March '16 village meeting].</p> <p>27. Reports obtained contributory to the proposal.</p> <p>28. The proposal is fundamentally about planning and development. Dec '19 / Jan'20 Parish News at page 16 states the proposal came about following a public meeting held (on 19th March) 2016, about new building.</p> <p>29. Funding was secured for the engagement of a Planning Consultant. Claire Wright was introduced to the meeting on 12th December 2017 as a Planning Consultant. At the Parish Council meeting on 9th April 2019 the meeting was told that the Planning Consultant's report was not yet available because she had been poorly, but the PC seems not to have insisted on this clearly very important report being with the Evidence Base. A note of the working party's meeting dated 16th January 2018 states that £3925 funding was secured towards work including a 'Town Planning Adviser' but this report seems not to have been produced?</p> <p>30. Further observations on the draft proposals</p> <p>31. Wildlife</p> <p>32. A wildlife/ecology report was obtained. The PC confirmed to me [letter. 5th Nov. 2018] that the consultant had not required access to any of my land. I have commissioned two wildlife/ ecology reports, i. Land at The Allotment Field (2016) and ii. Land west of Cuffers Lane (2019), both on public record at 3PL/2016/0636/0 & 3PL/2019/0301/F. Both consultants did go over my land. In neither case has the presence of any species been identified, although potential habitats are identified nearby. The draft states [2.3.7] that Great Crested Newts are present but the wildlife/ecology report states [p.23] 'no</p>	<p>26. This is very much a minority view. 95% of SURVEY17 responders like living in the village, most particularly citing the community friendliness. The Plan does not stop, nor seek to stop, further growth. Being criteria-based, it sets guidelines to inform new development coming through and seeking more complete information to be submitted with applications for new development with which to better understand the consequences and benefits of new proposals.</p> <p>29. The role of the Town Planner was one of overview and advice to ensure that the activities of the working party met statutory requirements. To that end, the consultant gave advice on policy development, public engagement, particularly the format and content of the focus groups and preparations for the public exhibition, and the drafting of the two statutory documents: the Consultation Statement and Basic Conditions Statement.</p> <p>32. Most preliminary ecological appraisals are done by a 'desktop' approach, supplemented by a visit to confirm the desktop findings rather than necessarily seeing and identifying individual wildlife species on a given day or season. Our consultant's report paints an even more accurate picture as it includes a survey of observations by residents and specialist confirmation of bats, a key indicator. In this particular case, there are recent independent, verified records documenting the bat life across scores of locations over a 2 km area of the village and surrounding areas. Included is the rarest bat in the UK,</p>
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	<p>record of Great Crested Newts or breeding ponds within 2km'. Bats are said to be present, many species identified but the reports I commissioned only identified likely habitat. [2.3.8] states that no formal ecology studies were done until now but I mention above two I have provided recently. [2.3.9] states the new report is for the first time in history, so there seem to be several points here that need correcting.</p> <p>33. There is wildlife all over the countryside and BNG, see below, addresses it. It should not be a barrier to development [2.3.11] [2.3.14] but instead an opportunity. 'Protecting' should not mean stopping anything happening.</p> <p>34. The draft [2.3.17] ought perhaps to mention Biodiversity Net Gain 'BNG' which is the balance, now a requirement in modern planning, that new development must show a 10% gain in biodiversity, for example for habitat, and referencing species impact and so on. Opportunities for development within the existing envelope are limited and will soon crowd out, so a preference against village growth is negative to habitat protection and counterproductive to the now standard requirements of BNG. I think the draft is off target so far as BNG is concerned and should re-consider any focus towards more houses within the existing envelope, missing the important opportunity to further its own preferences and aims.</p> <p>35. Other issues</p> <p>36. There seems to me to be a clear preference from the draft, against further development of the village. This means that in order to address the imbalance of few modern, fuel efficient, well insulated houses with good parking and suitable for elderly people or for young families, (per. O'Riordan), the only possibility is of more infill into the few remaining existing gardens. This approach is in my view short sighted. It stifles and crowds a thing the whole project seeks to preserve, which is the heritage of the existing village. Space will soon run out for new dwellings. I think there is too much emphasis on the perceived boundary of the assumed 'Moat' whereas it would be perfectly possible to continue featuring the heritage assets whilst allowing some careful growth of the overall envelope. The public</p>	<p>the Barbastelle, which is red listed. New Buckenham is home to 10 of the 18 bat species including 4 of the country's rarest 6 bats named in the IUCN Red list 2020. There are photographic records of great crested newts in various locations.</p> <p>34. BNG and the Environment Bill are now referred to in the text.</p> <p>36. The Plan takes a 'context' approach in that it discusses what is already here and considerations of wildlife, landscape and heritage. In the appendices there are recommendations about new development design so that new development may be properly assimilated into the village without damaging its historic integrity.</p>
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	<p>opinions as at 16th March '16 are set out in my letter to the PC of 29th Sept. '18.</p> <p>37. The draft states [2.5.5] that the settlement is unsuitable for future growth citing HOU 02, but the section omits policy HOU 05 'Small villages and hamlets outside settlement boundaries' which offers wider scope. [2.5.5] seems to present an incomplete picture of the relevant policies.</p> <p>38. [2.5.6] seems to imply that the Housing Needs Survey written by Breckland is now superseded by S17, but Mr Heaton, the Breckland Officer who wrote the Housing Needs Survey report considers the findings are still relevant. Social housing is a relevant aspect of community mix especially where limited rental property is available. A PC working party in 2016 was unable to find any sites in the village for social housing.</p> <p>39. [2.5.10] omits to mention the still available donation to the village of the land for the five affordable houses recommended in the (still valid) Housing Needs Survey, which could be added to the Almshouses portfolio or Parish Council owned to control occupancy and the concern that they would find their way into the open market. Despite reminding the PC of this the point has been omitted from the draft.</p> <p>40. [2.5.11] sets what is really an impossible bar in a requirement to demonstrate no harm in 'rounding off', who decides?</p>	<p>37. A reference to HOU05 has been made. The principle of new development coming forward will continue to be determined under Breckland's Local Plan. This Plan, being criteria-based, will shape the quality and form of new development.</p> <p>38. SURVEY17 does not negate the Housing Needs Survey of 2014 which is included in the evidence section of this Plan because it is a starting point for the discussion about housing development in this village. The 2014 survey identified a need for a mix of affordable housing. SURVEY17 also reinforced the wish for smaller, less-expensive housing units, i.e. no 'more executive homes', while at the same time expressing anxieties about the risk of increased traffic and parking problems. As mentioned in an earlier response, reservations were voiced about the construction of the Housing Needs Survey and the need for a specific number of affordable houses extrapolated from a limited sample. Individuals' needs vary over time but as stated in para 2.5.7 that 'there is likely to be a wish by a number of households (that may comprise single occupiers) to have housing that could be described as affordable as defined by the NPPF'. The principles of providing affordable or social housing remain but achieving this on a continuing basis is difficult for the reasons given. The Parish Council found no acceptable sites for new housing.</p> <p>39. This application to develop (2016) was refused by Breckland.³ The Almshouses trustees would not take this on as it does not sit with the Objects of the Charity or with the Almshouse Association. The Parish Council does not intend to take on property for rental.</p> <p>40. All proposals would be subject to the usual planning approval process. The Plan seeks additional information such as</p>
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³ <http://planning.breckland.gov.uk/OcellaWeb/planningConditions?reference=3PL/2016/0636/O>

	<p>41. [2.5.12] really means no more development should be allowed at all inside the existing envelope unless off road parking can be provided, but even that brings more cars because households have extra cars and visitors to that new dwelling bring them as well and park in the street. Village parking gets worse the more houses arrive in the envelope. More houses plus more off road parking will rapidly deplete the remaining village garden space and green gaps, and the wildlife it accommodates.</p> <p>42. [2.5.14] seems to ignore the now standard requirement to allow for 'BNG' so the statement is not really valid, implying that the presence of wildlife is grounds for not building around the village. BNG provides a balance and can create more green spaces and wildlife corridors. My recent farm building planning consent includes hedging, a Skylark area and bat boxes that were not there before, for example.</p> <p>43. [2.5.15] and [3.1.3] seem risky because they suggests the PC might have an early bite at considering a planning application, but the PC has very limited knowledge of such matters so how should it decide? The point was perfectly demonstrated by my recent (and ultimately successful) application for a farm building that the PC objected to on the grounds of 'disproportionality to the acreage of the holding' but it was completely unqualified to make such an assessment (none of the PC are farmers) or use that as grounds to object. The para. seeks to imply that the PC might become a pre-application panel? The idea has potential but the powers it implies should be very much toned down. The PC is not a Planning Authority and should not seek to become one. There is no way to predict what the PC might even be like in future years.</p> <p>44. [2.6.5] Cuffers Lane is also used by farm traffic and the bin lorry that routinely goes that way, in addition to delivery and other traffic. Is it a perfectly serviceable if narrow public highway in regular use connecting to Old Buckenham and other local communities.</p>	<p>contextual drawings, as per Appendix A of the Plan, so that the implications of development can be fully understood.</p> <p>41. Parking issues are a key source of aggravation in village life and it is correct that New Buckenham is no exception but to date little has been done to manage visitor parking within this village. The Plan recommends a designated village car park and clear signage</p> <p>42. Please see the response to point 34.</p> <p>43. There is no suggestion that additional powers are needed, rather that there is scope and opportunity for the Parish Council within its existing role to engage with planning applications at an early stage. To assist councillors with their deliberations a checklist is prepared. See Appendix 1.</p> <p>44. The attractive Cuffer Lane is currently one of the quieter lanes in the village as vehicle movements are relatively few. It is much used for recreational purposes by people of all ages, awareness of it having increased during the Covid19 crisis.</p>
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<p>45. [2.7.12] on the one hand suggests support for tourism based development but at the same time gives reasons why it could not in fact happen. Who would decide as to 'demonstrate a benefit to the village as to economy environment and landscape'? This viewpoint could very easily be used to block any tourism based development so perhaps requires amendment. The recently announced closure of The George is a clear indication that anything reasonably possible should be done to improve the footfall potential of tourism rather than identifying reasons against it.</p> <p>46. [2.8.1] refers to the magnificent church whose custodians have in recent years expressed concerns about falling congregations and this ought perhaps to be addressed by strongly promoting it as a performance and meeting space. CA RHC 2 supports this so could it be cross referenced?</p> <p>47. Policies LH1 to 4 [2.2.11 to 14] could easily be used to prevent any building, LH3 in particular places a complete block on growth which is unwise and not in line with HOU 05. These should all be revised and softened in light of the comments made elsewhere. LH4 assumes the whole settlement was designed, for which there is no evidence base. Demonstrating a 'positive impact' as in LH2 is an objective criteria, who decides? These policies as currently drafted are far too restrictive and will cripple the future of the village.</p> <p>48. Policy CE1 and 2 [2.3.17 to 20] are covered by BNG policies and are again easily useable to block village growth or conversion which is unwise so they should be softened or revised altogether. If Cuffer Lane 'and margins' is considered suitable for inclusion then so should Castle Hill Road and margins especially as the land between</p>	<p>45. There has been an interesting debate in the village along the lines you describe but 2.7.12 refer to initiatives that may well not involve development other than perhaps extending the car park or modest signage. In practice it is likely that proposals will be assessed on a case-by-case basis. For clarification, The George has not existed for about nine years as it was renamed the Inn on the Green. This is now closed and the site is planned to be converted to residential accommodation. Tourism is clearly a complex issue which is an anxiety to many of the people who have put forward views. The NP group has taken note of many comments and concerns not least from the NWT whose visitor policy that would allow for more visitors but only " within the limits of existing on-site visitor infrastructure and off-site local infrastructure... with the focus for any visitor increase being primarily to promote the quiet enjoyment of the site".</p> <p>46. Agreed. St. Martin's Church is mentioned in 2.8.2 and 2.8.6., the latter is amended.</p> <p>47. Nothing in SURVEY17 supported view that lack of development will 'cripple the future of the village'. Survey17 demonstrated that the resident population has little or no appetite for a larger settlement and greatly values the historic nature of the village and the attractive rural setting. The wording of policies 2.2.11–14 provide the context against which development proposals should be assessed. As already stated, any policy has the potential to be poorly administered. There is no intent to block the will of the majority of residents. LH3 does not block growth. It demands that 'proposals demonstrate an awareness of and respect for the historic boundaries etc..."</p> <p>48. An additional view that includes the Castle Hill Road approach to the village could be added but we think Castle Hill Road is a road lined with trees rather than an open space with a significant view.</p>
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	<p>the Vicarage and Castle House is in the Conservation Area as well as being 'Scheduled Land' and outer bailey of the Castle. I suggest a 'view to be preserved' marker (per. Fig. 6) should be added to highlight this very important historical outlook.</p> <p>49. Policy DS4 [2.4.8] 'annoyance to local residents' is a guideline that could easily lead to objection and is too limiting. Perhaps the topic could be covered by wording suggesting a preference for time controllers?, for example. Equally DS3 seems to provide extremely restrictive rules which ought perhaps to be re-worded less tightly. Perhaps DS4 could be modified to include the words 'externally mounted'?</p> <p>50. HB6 [2.5.22] 'buildings of local merit' seems rather vague. The existing 'Listed Building' registration is perhaps a suitable qualifier here? Who would decide/ is anybody local qualified (into the long term future) to assess 'merit'? Perhaps this kind of vague wording lays open a floodgate for multiple objections?</p> <p>51. TP1 [2.6.15] can I suggest this is re-worded as 'new development access routes should, for the benefit of pedestrians, match or retain the surfacing of any existing or immediately adjacent pavement'. The policy is otherwise open to endless debate.</p> <p>52. BT3 [2.7.12] who would assess this benefit? The policy seems too tight and could easily be used to block any tourist based development. It states an encouragement but identifies issues that could far too easily stifle such applications.</p> <p>53. CA BT 4. Ought this not to explain more, what is a Community Asset, what would this mean to an owner of private property? Perhaps the Glossary could be amended to address this?</p> <p>54. [3.1.6] and [3.1.9] are perhaps from O'Riordan (housing for older and younger people)? and ought to be welcome but given these both groups probably need cars it is very hard to see how they could be incorporated without carving up yet more gardens within the existing built village, and yet preferences are identified elsewhere against growth of the envelope, so the</p>	<p>49. These are helpful suggestions and the text has been modified.</p> <p>51. Thank you. The draft Plan alluded to space shared by pedestrian and vehicular traffic but was poorly worded. This text has been amended.</p> <p>52. As above, business and tourism development would have to be assessed by the Parish Council and District Council on a case-by-case basis.</p> <p>53. Thank you. The Glossary has been amended.</p> <p>54,55,56. The Parish Council reiterates the point that although the Plan does not identify sites for development, (see response to point 36) neither does it prevent further development. The village is expected to grow in time.</p>
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	<p>preference in this paragraph will soon be unachievable unless other preferences set out in the draft are relaxed to accommodate it.</p> <p>55. The NOMIS report states there are 122 residents between 65 and 90+ years of age, out of 460 i.e. 26.5% (¼) of the population is over 65. It also shows 79 persons up to the age of 17, (17%), leaving 56.5 % in the middle age band 18 to 64, slightly more than half. S17 results show only 26% of residents were in full time employment (¼). The proposal rightly supports more smaller houses, but they must be available at manageable prices. [2.5.9 : Mr Beales] states house prices are higher in the village so to keep some within the reach of a moderate budget more will be required. It is as simple as that, or the village will become only occupiable by those with generous means. Plots sliced off gardens will be increasingly expensive.</p> <p>56. Infilling means driving up the price of houses with potentially developable gardens, so making them even less affordable. A theme seeming to limit growth of the village creates a windfall for those owners. Any suggestion against village growth therefore seems to me a highly undesirable theme to be promoting and will further skew the price and affordability of village properties towards those with higher budgets which is not healthy for the future mix of village occupants. This suggests a serious re-think of the draft may be worthwhile.</p> <p>57. I suggest a policy should be added requiring payment of a proportion of the land value (valued with Planning Permission if granted) to the village of any plot created out of an existing garden or Conservation Area, payable to the High Bailiff's Trust, in order to discourage cramming more houses into the village and to enable the village to enjoy a portion of the windfall from such development. This will also discourage more building into green gaps that now exist between houses.</p> <p>58. I also suggest that as a part of this Neighbourhood Plan for the future of the village and surrounds, a review of the older and now depleted charities in the village, so they retain their identity, to be brought within the High Bailiff's Trust towards maintenance</p>	<p>The principle of new development coming forward will continue to be determined under the Breckland Adopted Local Plan. This Plan will shape the quality of new development as it is a criteria-based Plan, where the views policies and emphasis on quality will better manage issues such as infilling.</p> <p>57. This is outside the scope of a neighbourhood plan.</p> <p>58. This is outside the scope of a neighbourhood plan. The Parish Council is not aware of any current depleted charities. The redundant Juby's Charity was wound up many years ago.</p>
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	<p>and management of the publicly owned heritage assets.</p> <p>59. The profusion of very old houses is agreeable if you purchased one many years ago but less attractive now if you want to heat, alter, insure or maintain one on a modest budget. They are cold, hard to heat and improve and costly to mend. Modern well insulated energy and fuel efficient houses are essential, (per. O’Riordan) which the proposal identifies but there do seem to be wide reasons advanced as to why they cannot easily be provided?</p> <p>60. [3.1.9] recommends that development should be proportionate to plot size, but if the overall preference is of no village growth then plot size is limited to remaining gardens so ever more crowding and depletion of gardens which seems counterproductive to the preservation of the ancient village?</p> <p>61. [3.1.9] last bullet point, seems an obvious block to growth and perhaps existing overshadowing guidelines already cover the point.</p> <p>62. Appendix 1. [3.1.1] Could this be re-worded to apply to ‘The Plan Area’ so as to include the portions of Old Buckenham that are in the proposal.</p> <p>63. Practical Observation; Ponding of water at the junction of St. Martins Gardens is probably because when Mr. Brewster’s yard was redeveloped, the drain under it that ran to the ditch behind the Grange, was truncated and the problem could very likely be alleviated if a new drain were laid under what is now called Moat Lane to the section of Moat referred to, thus restoring it to a water holding wildlife haven next to the popular footpath.</p> <p>In summary my points, including some that are a complaint, are;</p> <p>64. The PC did not ensure the proposal involved everybody equally; in fact it endorsed the landowners’ exclusion, despite in my case writing a whole year beforehand asking to be included. Many landowners said they heard nothing about the proposal and never had the questionnaire; insufficient</p>	<p>59. Any new development needs to be insulated and energy efficient. New development consumes natural resources however and there is a point of view that refurbishment may use less such resource. https://www.architectsdeclare.com There is an impression that most village houses have been greatly refurbished to improve energy efficiency. Historic England suggests low-impact measures to assist old buildings in meeting modern thermal comfort needs.</p> <p>60. Please see our response to point 54.</p> <p>61. These points appear no more than good design practice.</p> <p>62. Thank you. The text has been clarified.</p> <p>63. The Parish Council will discuss this further.</p> <p>64-69. In preparing the Plan the working party (and through it, the Parish Council) has been guided by the legislation and regulations, a range of national guidance and has taken advice from officers of Breckland Council. Furthermore it took</p>
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	<p>steps were taken to see that the land owners had received notification. This exclusion serves to discourage positive involvement of the landowners and instead generates ill feeling and a negative view towards the project that affects and involves their land. The approach was in my view a serious mistake.</p> <p>65. The consultation that was eventually extended to the landowners was entirely different in scope and nature to S17.</p> <p>66. My request/ suggestion (November 2018) that a representative of the landowners should be included in the working party was ignored. The landowners' Focus Group never happened. Some of them have a lifetime and generations of involvement in the proposal area.</p> <p>67. The PC ought not to have allowed anything that might be seen as prioritising the interests of some of those affected over others, the opportunity for real inclusivity was unfortunately missed.</p> <p>68. A very important report that the parish council meeting on April 9th 2019 was told was merely delayed by ill health, and for which funding was earlier approved, has not in fact been produced at all so the report of a 'Planning Consultant' is absent from the Evidence Base.</p> <p>69. I have responded to the consultation generally with various points on the draft and policies it sets out and made what I hope are some useful suggestions. I therefore request the project is put formally on hold while the Breckland Monitoring Officer considers the matter.</p> <p>Some of what I mention might have come out earlier had there been full engagement with the land owners. My viewpoint is that of forth generation New Buckenham community involvement and landowner in the plan area for almost 60 years. Some may read my letter as a desire to develop my land, it should not be seen as such, but rather an expression of genuine concern about these proposals.</p>	<p>advice from specialists in conducting surveys and public engagement.</p> <p>There is nothing in the legislation or regulations to say how a Parish Council should produce a Neighbourhood Plan other than whom to consult and the statutory documents that need to be submitted to the Local Planning Authority.</p> <p>To date, Breckland Council has voiced no concerns about the Parish Council or Working Group not meeting any of the regulatory requirements.</p> <p>Any concerns about the consultation element of the Neighbourhood Plan project, can be addressed by making comments about the Consultation Statement which is one of the documents that is issued for consultation at the same time as the Submission version (Reg.16) of the Neighbourhood Plan. Neither of these have yet been issued and there will be an announcement when this happens in Parish News and on the website www.np4nb.online.</p> <p>Any concerns about the Neighbourhood Plan itself, may be addressed by making comments to Breckland Council during the public consultation stages when the Submission Version (Reg 16) is issued. Once received all the comments will be sent to the Independent Examiner to consider, along with other documents and any comments made on them, as part of the Examination stage. It will be at this stage that that a view is taken by the Independent Examiner about the Plan.</p>
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The following set of comments appears to have been misdirected and was not received during the consultation, but came to light after further discussion with the sender in April 2021.

<p>36 Norfolk Wildlife Trust</p>	<p>Dear New Buckenham Neighbourhood Plan team,</p> <p>Thank you for consulting the Trust on the draft plan. We have the following specific comments to make regarding the biodiversity aspects of the draft plan:</p> <p><u>CE1-3</u> We support the Countryside and Environment policies (CE1-3). We support the requirement to maintain and wherever possible enhance biodiversity and wildlife networks in new development in policies CE1 and CE3, and suggest reference could be made to particular features such as green roofs and walls, or using locally sourced wildflower and tree seeds where enhancements are sought for open spaces. We would be happy to provide further advice on this aspect if that would be helpful. We would also like to highlight a measure in the current Environment Bill which, when passed, will require all new development (proportionally) to provide a measurable net gain for biodiversity. We also support the designation of local green spaces as important parts of the local green infrastructure in policy CE2, ensuring that there are spaces for people to enjoy wildlife every day inside the settlement as well as nearby in the important wildlife sites that surround the built area.</p> <p><u>GE4</u> Given the links between sustainable use of resources and ensuring a sustainable future for our wildlife, in particular relating to the likely impacts on our native wildlife from climate change, we support the inclusion of policy GE4. Point 10 of the checklist refers to provision of bat and swift boxes on walls. On this point, a range of integral boxes for bats and birds are available, which add a negligible cost to new build and can be incorporated as standard in all new build if required by the local plan.</p> <p><u>DS1-4; HB8</u> Noting the extensive work that the community has carried out to identify the importance of the local area for bats, we also</p>	<p>Thank you for your support of our policies relevant to biodiversity.</p> <p>Local sourcing and wildflower seeds added to policy CE 2.</p> <p>We think this refers to policy CE 4.</p> <p>Integral bat boxes added to Appendix B text.</p>
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	<p>support policies DS1-4 which should contribute to maintaining suitable environment for nocturnal wildlife. Similarly, we also support policy HB8 which will help ensure that the settlement remains permeable (and therefore continues to provide valuable garden habitat) to declining species such as hedgehogs.</p>	
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*As mentioned at the start of this document, please note that in the following table the paragraph numbering in the second column refers to the **Pre-submission Version** of the Plan. The responses in the fourth column refer to the changes made in drafting the Submission version. Text revisions have meant that some of the paragraph numbers have also been changed.*

New Buckenham Neighbourhood Plan (2019)

Reg.14 Plan comments

From: Breckland District Council

Key: Neighbourhood Plan – NP / National Planning Policy Framework – NPPF

This is a well-presented plan, but there are still areas that need to be improved. The most significant issue is that more evidence is required to justify the policies, to remove the risk of an examiner removing them, and some of the policy wording needs to be developed so it is clearer what is meant. In terms of policy, some of the policies would be better placed in different chapters (as is the case with some supporting text), some duplicate Local Plan policy and some are Community Actions rather than policy. Also there does seem to be some confusion over the Local Green Space policy; as well as duplication of lighting policies.

Black text is Breckland comments and suggestions. Red text is response by Neighbourhood Plan Working Party.

Page and Policy/ Paragraph No	Comment	Justification	Suggested Amendments
Whole Plan	<p>Format – As previously advised, this is a very well-presented and laid out plan, which has improved and significantly developed, since we commented on the last informal version e.g. the use of photos.</p> <p>However, the structure needs to be more consistent in terms of what comes under each section, in each chapter.</p>	Consistency	<p>Review what needs to be presented in each section e.g. first a description and facts about the policy subject; then issues and public opinion about this, followed by the policy. Also a subheading that relates to each policy would be useful, as the justification does not lie just before or after the policy (a typical approach). Each policy is now tagged with Plan's stated aims and add references to further justify where appropriate.</p>

Whole Plan	Justification (supporting text) – this the most significant issue for the plan as it still needs to be developed, as taking account of just national guidance or local opinion is not enough; evidence is still needed for each policy at a local level to justify how this is being achieved or the reason for the policy. Without providing sufficient evidence risks an examiner removing a policy.	<i>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence”, para 31, NPPF.</i>	As advised.
Whole Plan	Although most of the policy text is clear and precise, there are still a number of technical planning matters that need amending or clarifying, which have addressed in detail below. Also reference to ‘emerging’ Local Plan need to be removed as it has now been adopted.	Clarity	As advised. No more emerging.
Whole Plan	Referencing - while we support the overall approach taken, when a document is being referred to it would help to include the actual paragraph or text being referred to, either in the plan or reference, to help understand the point being made.	Clarity	Provide a website link. Agreed and modified where appropriate.
Maps	Although clearly presented, as previously are missing advised, all maps still have the north rose (compass) missing and the key could be made larger (12pt) in most cases, as well as the size of some of the maps e.g. Figure 2 is fine.	Clarity	As advised. Maps amended accordingly although they are the largest possible to fit pages.

Front cover	The wording <i>“in association”</i> needs re phrasing as this produced by or on behalf of the Parish Council, not Breckland Council.	Accuracy	<i>“With the support of”</i> would be more appropriate. Agreed and altered.
Forward – para 7 & 8	The wording needs further amending regarding the documents to be submitted, the processes the plan has to go through and terminology used.	Accuracy	<i>“... together with all the comments received in a document showing how the consultation was carried out and a statement showing how it meets the Examination tests.</i> <i>Breckland will subject it to a further statutory consultation and examination scrutiny leading to the Plan’s final version.</i> <i>“Breckland will then become part of Breckland’s statutory land-use planning ‘development plan’ for the area framework.</i> Altered.
Omission	As previously advised, it’s always useful to have a list of the policies either at the front or back of a plan, to assist the user which issues are being addressed by the local community.	Clarity	As advised. List of policies and CAs added to back of document.
1 Context			
p3, para 1.1.1	5 th & 6 th sentences - some of the text needs to be amended and updated as it is not consistent with para 1.2.2 below. The plan has some weight after an examination as it must be taken account when making decisions on planning applications. It forms part of the ‘development plan’ after a	Accuracy	“At that point i It first has some statutory weight after the examination and must be referred to by the local authority, in our case Breckland. Both Breckland’s Local Plan (currently under Independent Examination) ...” Done.

	'yes' vote in the referendum, not when the plan is signed off by the local planning authority.		
p3, para 1.1.2	1 st sentence - It would be useful to clarify what is meant by ' <i>lengthy process</i> '?	Clarity	<i>"Although neighbourhood planning is a lengthy process (typically around three years) ..."</i> Done.
p3, para 1.2.1	2 nd sentence - Some of the text still needs to be amended - once the Referendum has occurred, although the NP becomes part of the 'development plan', Breckland can change this status when they make their final decision on the plan.	(ss2,s70,c8, TCPA 1990) (ss3A, s38,c5, PCPA 2004) - Neighbourhood Planning Act 2017, Section 1.	<i>"It becomes part of the 'development plan' finalised when that community agrees it in a local referendum The Plan is formally in place once it is approved 'made' by Breckland</i> <i>in the village referendum</i> ". Done, Neighbourhood Planning Act referenced.
p3, para 1.2.3	2 nd sentence - Reference to Community Action in green boxes is also mentioned, more appropriately, on p9, para 2.1.3.	Duplication	<i>"...by the community itself. Community Actions are therefore suggested, highlighted in green boxes in this Plan. They need to..."</i> Now in 2.1.1.
p4, para 1.3.2	1 st sentence - Some of the text needs to be amended corrected – there is no legislation in the NPPF.	Accuracy	<i>"All decisions about building and development across England must have regard to the policies and legislation in the National Planning Policy Framework (NPPF), revised in 2019 and other relevant legislation".</i> Done.
p4, para 1.3.3	1 st sentence - The text needs some minor amending.	Accuracy	<i>"The regulation that rules by which this Plan needs to meet is written are known as the 'Basic Conditions'".</i> Done.
	It is worth clarifying what the Basic Conditions are, after the 1 st sentence.	Clarity	<i>"These are having regard to national policies, achieving sustainable development, being in general conformity with the strategic policies in the Local Plan and meeting other environmental and planning legislation and regulations".</i> Done.

p4, para 1.4	Format – the paragraph number is missing.	Clarity	As advised. Corrected.
	Also it would read better if the sentences were reordered and split into separate paragraphs e.g. the geography of the area, past history and current day life.	Clarity	As advised. Done.
p4, para 1.5.1	1 st sentence - Some of the text needs to be amended and updated.	Accuracy	<i>“Breckland’s Local Plan, recently adopted in November revised and close to completion in October 2019...”</i> <i>“The Local Plan notes identifies Thetford (16 miles away) and Attleborough (5 miles away) as “major towns...”</i> Done.
p5, para 1.5.3	2 nd sentence – Some of the text needs to be amended – as previously advised, there is no requirement at any level that requires Neighbourhood Plans to allocate any sites.	Accuracy	<i>“For this reason there is no local government requirement for the community to ...”</i> Done.
p5, para 1.5.4	2 nd sentence – “... <i>remaining compatible with Breckland and National policies</i> ”. There is more flexibility than this suggests – a Neighbourhood Plan only need to ‘ <i>take account</i> ’ of National policies and conform to the ‘strategic’ policies in the Local Plan.	Accuracy	Rephrase as advised as a different approach is required for each document. Corrected.
p5, para 1.6.1 & last para of 1.6.2	In view of the title, this section needs to more clearly relate to the following sections aims. The outcome of the consultation needs to be made clearer and, as a result of this, a vision for the area needs to be expressed much more clearly.	Clarity	Showing the percentage for each of the consultations’ key findings (see below), both positive and negative and have a vision that stands out from the rest of the text. More percentages added in the text and all SURVEY17 results will be online, referenced in the text, and in the Plan's text as appropriate.

	3 rd & 4 th sentences – what % wanted to see <i>‘an attractive friendly and healthy place to live’</i> and infrastructure modernised?	Clarity	Either provide figures or rephrase according to how the questions were asked.
	1. Rest of the paragraph & last sentence of para 1.6.2 - quantify each of the statements made to strengthen the evidence.	Evidence	Add a % for each of the statements made. More percentages added in the text and all SURVEY17 results will be online, referenced in the text, and in the Plan's text as appropriate.
p5, para 1.6.2	All of this paragraph, except the last sentence, would fit better in section 1.4.	Accuracy	As advised. Adjusted.
p6, 1.6.2 Being part of the community.	Format - It may be useful to add labels stating what the event is.	Clarity	As advised. Labels added.
p6, para 1.7.1	Why is it the <i>‘Parish Council’s wishes’</i> , rather than the Local Community’s as a result of <i>SURVEY17</i> ?	Clarity	If this is not the case, a clearer explanation of how the Parish Council decided upon these aims is needed. Adjusted.
	1 st bullet point – what is considered ‘good quality’ – national guidance refers to buildings being <i>‘well-designed’</i> , rather than using high quality materials, as this could have viability implications.	Para 8b, NPPF	<i>“Consider new, well designed good quality development that...”</i> Done.
p7, Figure 1	With the exception of the missing rose, this is a well presented map.	Accuracy	As advised. Thank you.
p8, para 1.10.3	It would be useful to explain why the conservation area has been designated e.g. it’s a 12 century planned settlement and mention the other heritage features.	Clarity	Provide details about the features which gave the village the-conservation area status. Para 1.10.2 altered.

p8, Figure 2	The key for the Neighbourhood Plan area is also missing.	Accuracy	As advised. Outline of Neighbourhood Plan designated area added to this map.
p9, para 2.1.3	To make clear how the plan is laid out, add a new sentence to the start of the paragraph about how the planning policies are presented and make the text clearer at the end.	Clarity	<i>“For each topic, planning policies are presented in blue boxes, and Community Actions, that are not part of the (statutory) Plan, are suggested and these are presented highlighted in green boxes”.</i> Amended
2.2 Landscape & heritage			
Need to draw conclusions from the evidence on how development should respond to this.			Para 2.2.9 amended to note design principles in Appendix 1. Reference in new para 2.5.15.
p9, 2.2 Landscape	Very thorough information about the pattern and grain of development in the village well as the historic background. However, there is no guidance on where and what type of development would be appropriate and what are the constraints.	Clarity	Need to draw conclusions from the evidence on how development should respond to this. Para 2.2.9 amended to note design principles in Appendix 1. Reference in new para 2.5.15.
p9, para 2.2.4	<i>‘Heritage Designations’</i> should read <i>‘designated heritage assets’</i>	Terminology	As advised. Done.
p10, 2.2.3. Earthworks and ruins of the medieval castle	Format - The combined use of map and photographs are very useful, but it would be helpful if the view, for each photograph, was labelled.	Clarity	Label from which side, as presented on p16, 2.2.14. Important views around the village. Done.

p10, Figure 3	Due to the colours used, it is difficult to see where the (yellow) Grade I buildings are, so consider using more noticeable colours. It would be useful to increase the size of the key and the key for the Neighbourhood Plan area is also missing.	Clarity	As advised. Leave unchanged as the difference is much easier to see online rather than in the printed version. Key made bigger.
p11, 2.2.4 <i>'Some village heritage buildings'</i>	This should read <i>'heritage assets'</i> or add <i>'(assets)'</i> at the end of the title.	Terminology	As advised. They are 'historic buildings'!
p13, Figure 4	It would be useful to explain about the numbers on the Map. It is not clear what is meant by <i>'Archaeological observations'</i> . Also it would be useful increasing the size of the key, and the key for the Neighbourhood Plan area is missing.	Clarity	Clarify what the 'Archaeological observations' are. Add NP area where visible and add to key as well.
p13, para 2.2.7.	1 st sentence - Are the 'medieval earthworks' the same 'Archaeological observations' referred to in the map in Figure 4?		If this is the case, use the former description. If not, use a clearer description in the key. A note to Fig. 11 has been added that explains the NHER numbers.
p13, para 2.2.8.	If there have been any issues regarding the design or quality of development in the village, these should be recorded here, as further evidence for the need to have strong heritage policies.	Evidence	As advised. Added: Issues of building design were not significantly raised in the surveys, but firm views were discussed in the professionally led discussion 'Walk and Talk with the Architect'. Quotations about appreciating the heritage and setting will be added to the Plan's text.

			<p><i>Some people have informally shown concern that some historic buildings were never listed although there is general protection from the Conservation Area status. That Breckland has a diligent conservation officer has been helpful in preserving heritage although some restrictions such as in glazing windows are stricter than neighbouring areas. These may need to be re-examined to ensure maximum energy conservation.</i></p> <p><i>There have been issues, some forcibly expressed, about what type of buildings should be built. Recently a recent pair of 'executive houses' appeared on a site that, it was argued, could have supported four smaller houses that would have helped satisfy demand for a higher proportion of smaller, less expensive dwellings.</i></p>
p14, Figure 5	<p>Due to the detail in this map it would be clearer if it was increased in size or more distinct colours used; at the moment it is difficult to read. The key for the buildings coloured in grey needs to be added.</p> <p>Also it would be useful increasing the size of the key, and the key for the Neighbourhood Plan area is missing.</p>	Clarity	<p>As advised.</p> <p>Has been done.</p> <p>No change (The map is of buildings 1883-2018. Pre 1883 buildings explained by caption).</p>
p14, para 2.2.10	<p>1st sentence - evidence for the views is weak; a more detailed justification is needed to avoid the risk of the Examiner removing them.</p>		<p>Clarify how the views were determined in the first place e.g. community consultation.</p> <p>Substituted with: The views looking towards and out from the village are important because they illustrate its uniquely defined boundary set in open landscape. Views 1, 2 and 5 are the views seen on</p>

			<p><i>approach the village by one of only three highway access routes: the B1113 north and south, and Cuffer Lane. These are well known to residents, tourists and recreational walkers. View 6 is from the Listed Monument (private property but visible from castle earthworks to which the public has concessionary access), illustrating the relationship between the castle and its adjacent village boundary.</i></p> <p><i>Views 3 and 4 are the 'hidden' views seen only by walkers on footpaths.</i></p> <p><i>Views and vistas reinforce a sense of place which, in this village, defines the context and character of the settlement. They are an incentive to recreational walking and make the village an attractive place to visit.</i></p>
	2 nd sentence Need to clarify why this is being stated.	Relevance	As advised. Modified and added to 2.2.9.
p14, last para	Format – a para number need adding.	Accuracy	As advised. Done.
p15, POLICY LH 1 Change of use and extensions to historic buildings	<p>This still requires re-wording, as an instruction to a Parish Council is not a land use planning policy and there could be genuine reasons why an application should not be supported.</p> <p>Also it could apply anywhere and provides less detail than the Local Plan policy, therefore it needs to be more specific e.g. requiring details about a proposed development's impact on</p>	<p>Clarity - <i>"Plans should ... contain policies that are clearly written and unambiguous ..."</i></p> <p>Para 16 d), NPPF (2019).</p>	<p>"The Parish Council should support planning applications that seeks to retain and revitalise historic buildings where sufficient information is provided, including detailed plans including the setting of the surrounding area, to demonstrate their potential positive impact on the local heritage context of social, environment or business."</p> <p>Development will be supported where it <i>Alter to: Development that seeks to alter and revitalise historic buildings will be supported if</i></p>

	the setting in the street scene and landscape (Appendix 1, para 3.1.4).		<i>they are to be conserved in a manner appropriate to their significance.</i> <i>Proposals should include sufficiently detailed plans of the buildings and their setting in the surrounding area to demonstrate a positive impact on the local heritage, taking into account the New Buckenham Landscape and Heritage Assessment.</i>
	Also as previously asked, What is ‘ <i>sufficient information</i> ’?	Clarity	This needs to be more precise e.g. is it specific information in a Design and Access Statement or Conservation Statement required & what should it contain? This should be outlined in the evidence. Paragraph revised.
	Also other wording still needs to be developed to be more technically accurate.	Terminology	“... that seek to retain and revitalise historic buildings involving alterations or change of use, <i>ensure the appropriate ongoing preservation of heritage assets either through conservation, renovation, remodelling, extension or adaptive reuse, ...”</i> . Corrected and Historic England guidance referenced.
p15, POLICY LH 2 New buildings	1 st sentence - the requirement that applications should demonstrate a ‘ <i>positive effect</i> ’ is not consistent with national and local planning policy terminology.	Policies should ‘ <i>conserve or enhance</i> ’, para p184 & 200 NPPF (2019). Adopted Local Plan policy ENV 07	‘Planning applications should demonstrate a positive effect upon <i>at minimum conserve, or enhance the historic character and fabric of the village</i> . Done.

	3 rd sentence - reference is made to design, but this is not followed up in relation to what is required. Also this could be clearer in terms of requirements.	Clarity	“Building design and materials... should be well designed and of good quality and not be harmful to.....This should can be demonstrated through submission of a range of drawings, including detailed plans showing the proposal in relation to the setting of the surrounding street scene and landscape , as shown” LH2 revised.
	Is there anything in the appendix that should have the weight of policy e.g. para 3.1.5—7?	Clarity	As advised. Para 3.1.5 is in Policy LH3, paras 3.1.6-7 are inherent in policies HB1 and HB6. These will be referenced accordingly.
p15, POLICY LH 3 New development and layout of the village	A minor amendment would be beneficial.	Clarity	“..., including the line of the town ditch, the medieval street grid layout and individual tenement plots”. Done.
p15, POLICY LH 4 New development and open countryside setting.	2 nd sentence - The linkage between the policy and views needs to be more clearly made. It needs to be more specific about what should not be compromised, as the castle has a Grade I Listing and is a Scheduled Monument	Clarity	Be specific to what should be not compromised. The openness of the countryside? View of Church or Castle etc? This should be addressed in para 2.2.10. The views illustrate the setting of the villages, particularly where open countryside abuts the village boundaries. The view from the castle shows the boundary, the reason it should not be compromised, not because it's a Scheduled Monument.
	Also what is an ‘ <i>unacceptable compromise</i> ’ - The text needs to explain this.	Evidence	As advised. Text amended.
	N.B. While we support this policy in principle, see comments re p14, para 2.2.10 concerning		Text expanded.

	evidence as currently there is more detail in the policy than the supporting text.		
p16, Figure 6	Format - The key is missing for the 'Views' and Neighbourhood Plan area. Also it needs to be enlarged to at least the Fig 5 size.	Clarity	As advised. Rearranged. The photos to be enlarged.
2.3 Countryside and environment			
p17, para 2.3.2	Format – 1 st sentence - There seems to a word missing. Also to be consistent with the rest of the plan, it would be better if the 3 rd -5 th sentences were added to the issues section, as the first section for each chapter covers factual matters.	Clarity	<i>"New Buckenham is a rural parish covering 0.67 sq. miles (1.73km) of which 10% is built on"</i> . Corrected (delete 'on'). Move text to para 2.3.11. Paragraphs rearranged.
p17, para 2.3.4 The orchids and essential grazing	Format – To be consistent with the rest of the plan this title would normally be at the top of the photos.	Consistency	As advised. All caption positions now consistent.
p19, para 2.3.8	4 th sentence- It would be useful to include an abbreviation for the Norfolk Wildlife Trust as this is referred to later on in the plan e.g. para 2.3.11.	Clarity	<i>"Similarly, there are few reliable records of the wildlife on the Common even though it is owned and managed by the Norfolk Wildlife Trust (NWT)"</i> . Section revised.
p19, para 2.3.11	3 rd bullet point – These are statements not issues.	Clarity	Delete 1 st sentence and for 2 nd sentence provide evidence for this. Paras and bullet points rearranged.

	5 th bullet point – It would be better if this opinion was move to the section 2.7 on Business and tourism, but also include the % to justify the statements	Clarity	As advised. Done.
Page 20	6th & 7th bullet points regarding green planning and infrastructure - This is not the case as this is covered under the NSPG GI and RAMS Strategy.	Accuracy	Amend in light of this. There are local authority strategies apparently in draft but as yet nothing published. The whole section has been revised.
p20, para 2.3.12	1 st sentence - It would be useful to clarify what type of 'green areas' are being referred to.	Clarity	<i>"Green policies impose demands to improve and maintain green areas (Open Spaces and Local Green Spaces) and green corridors</i> Whole section revised.
p20, para 2.3.13	2 nd sentence - Amendments are required in light of previous comment about reference to the Local Plan and the fact that the NPPF is a policy not legal document.	Clarity	<i>"Any policies must be compatible with Breckland Council and its emerging the Local Plan,^{26 27} which in turn reflects the policy legal requirements of the NPPF and provides guidance".</i> Whole section revised.
p20, para 2.3.14	2 nd sentence (end) - A minor amendment would be beneficial to be consistent with the wording rest of the plan.	Phrasing	<i>"..., including parish neighbourhood plans".</i> Whole section revised.
p21, para 2.3.15	It's not necessary to repeat what is already in the Local Plan e.g. outlining the existing Local Plan Open Spaces as the review of the Local Plan could make the Neighbourhood Plan outdated.	<i>"... avoiding unnecessary duplication of policies that apply to a particular area" Para 16 f)), NPPF (2019)</i>	See below. The criteria details could go in an appendix. This provides context to a reader of the Plan who is unfamiliar with the Local Plan.
	It is not clear what is trying to be achieved here as Open spaces are not the same a	Accuracy	<i>"This Plan can address these issues by confirming that the Local Green Spaces meet the following</i>

	<p>Local Green Spaces (LGS); we may have concern if all the former were being designated as the latter, as they have different functions.</p> <p>The criteria listed (except the first bullet point) relates only to LGS, therefore this needs to be amended.</p>		<p>requirements (see table on p23) Open Spaces^{29 30} designated by Breckland, i.e. that such spaces are:</p> <ul style="list-style-type: none"> • Not subject to existing planning permission or allocated for future development • Not an extensive “tract of land..... <p>and each <i>Local</i> Green Space must meet at least one of the following criteria:”</p> <p>Revised.</p>
p21, para 2.3.16	<p>1st sentence - It is not clear why there is a reference to Green corridors (& a map on p23 showing them), but no policy.</p> <p>N.B. We would have concern if they were designated as Local Green Spaces as they could be considered as ‘<i>extensive tract(s) of land</i>’.</p>	Clarity	<p>Either create a policy on them or delete the reference to them.</p> <p>Policy added about avoiding interruption of green corridors and, if possible, enhancing them.</p> <p>None of these are extensive tracts of land, they are mainly hedgerows.</p>
Reference ²⁹ Breckland Open Space Parish Schedule 2015	<p>It is noted that this table incorrectly refers to “St Mary’s” Church when it should be “St Martin’s Church”.</p> <p>Also in relation to “Outdoor Sports Sites”, the table is missing the location name for the sites.</p>		<p>This Plan corrects.</p>
p21, POLICY CE 1 Developments and natural environment	<p>2.3.17, 1st sentence – Why is the Local Plan approach not sufficient</p> <p>2nd & 3rd sentences – where is the evidence that justifies the need not to affect recreation and the need for a ‘<i>green space & landscaping</i>’ strategy?</p>	Evidence	<p><i>“... Such proposals should not impact adversely on areas also used for recreation.”</i> Added 'also' and explicitly worded in the policy as a reminder to the Parish Council!</p> <p>Also provide evidence for the last 2 sentences. Deleted 2nd and 3rd sentences.</p>

	2.3.18. As previously advised, the text at the end of the policy is unnecessary as this already applies. It has also been amended so it is now weaker e.g. 'should' rather than 'will'.	Phrasing	<i>"New development that makes a positive contribution to the existing network of green infrastructurewill should be supported subject to other policies in this Plan."</i> Revised.
p21, POLICY CE 2 Designation of local green spaces	2.3.19 – The policy would benefit from rewording.	Phrasing	<i>"This Neighbourhood Plan confirms the following sites have been allocated as Local Green Spaces³¹ as shown in Figure 7".</i> Done.
	2.3.20 – The requirement for such allocations to have a recreational purpose is much narrower than the national criteria which includes beauty, historic significance, tranquillity or richness of its wildlife; Also there is no local evidence to justify this approach.	Evidence Para 100, NPPF (2019) lists the criteria.	Either provide the local evidence or delete this section of the policy. Deleted.
	Also as previously advised, the evidence is needed to justify these sites.	Evidence	See comments p23, Designated Green Spaces showing how this can be is achieved. Deleted.
p22, 2.3.19. Local green spaces	It would be better if the map (Figure 7) was located on the same page as these photographs, as on page 16.	Consistency	As advised. Section is now together over two pages.
p23, Figure 7 Public open spaces and proposed green corridors	The map duplicates LP Open Space designations - see comments regarding p21, para 2.3.15. Also the map is not consistent with the policy as the title refers to ' <i>public open spaces and proposed green corridors</i> ' (and the key, has an edited version of this), yet the policy is about Local Green Spaces - this needs amending.	Duplication & Clarity	Rename the Figure to 'Local Green Spaces' Map of wildlife corridors and Open Spaces is now Figure 8, in a more logical sequence. Open Space boundaries to have colour different to LGSs.

	<p>Also it needs to be made clearer on the map, which site is which, by adding numbering to the map.</p> <p>Finally, the colour for the Local Green Space needs to be distinct from the NP area one, the key is missing for the NP area and it needs to be enlarged to at least the Fig 5 size.</p>	Clarity	<p>Add numbering on the Map, which is also added to the table below. Amend key as advised.</p> <p>We could have added numbers of the Open Spaces but instead deleted OS boundaries and referred to Breckland's own map. The key is then simpler.</p> <p>Increase size of the map. Map is biggest possible for page.</p>
p22, POLICY CE 3 Loss and restitution of important habitats	<p>2.3.21, 1st sentence – the approach taken regarding the features listed will depend on the status the habitats listed will have nationally.</p> <p>What ere is the evidence for this approach e.g. what designation do these areas come under?</p>	Evidence	<p>Either provide the evidence or clarify the mitigation required, if national guidance can't justify a refusal.</p> <p>Reference to castle and common deleted as they have full protection anyway.</p>
	<p>2.3.23 – Most 'essential infrastructure' is allowed by permitted development and would benefit from rewording.</p>	Phrasing	<p><i>"Where applications for development required Development work to provide essential infrastructure will be seriously considered-supported where the benefits clearly outweigh any harm and there are no reasonable alternative sites available."</i> Done, now part of CE 2.</p>
p23, Designated Green Spaces	<p>The title has the word 'local' missing.</p>	Omission	<p><i>'Designated Local Green Spaces see Figure 7 above'.</i> Whole section revised.</p>
	<p>Also the table needs amending to demonstrate how it meets the requirements of the NPPF, with each site numbered, and indicating which criteria applies (see comments re para 2.3.15 and Figure 7).</p>	Evidence	<p>See table in para 4.62, of the Croxton, Brettenham and Kilverstone Joint Neighbourhood Plan: https://www.breckland.gov.uk/media/10986/CBK-Joint-Neighbourhood-Plan-Referendum-version/pdf/CBK_Joint_Neighbourhood_Plan.pdf?m=636949053513770000</p>

	N.B. The owner and condition are not relevant considerations.		Table revised omitting condition. Retained ownership details as helpful information to residents. Table already has criteria. New map showing numbered Open Spaces. Considered similar format to Croxton NP.
p24, Community Action: Countryside and Environment	CA CE 1 & 2 - You may wish to clarify that this is referring to 'non-designated' green & blue, heritage or environmental areas e.g. those that have no formal designation, but have a local significance. CA CE 3 – who should this be reported to?	Clarity	As advised. CE 2,3 amended.
2.4 Dark skies and light pollution			
p25 Dark skies and light pollution	Statements are made about this issue, but there is no evidence for this in terms of reference to research or community engagement e.g. para 2.4.1 6 th para – how do you know light from buildings causes 'annoyance to passers-by'?	Evidence	<p>Either provide the evidence or delete the policies.</p> <p>Already in but revised para 2.4.1 about inappropriate lighting causing glare and local blindness. Done.</p> <p>Add paragraph about modern LED lighting, sensor or timer controlled being an aid to energy conservation and cost control. Done.</p> <p>Reference personal communications.</p> <p>There has been a great deal of community engagement. Some of it has been via meetings and discussions with residents, some of it was documented after the publication of the first draft</p>

			of the Plan. The NPPF 2019 also requires a reduction of light "in tranquil areas" etc.
p26, POLICY DS1 Keeping dark areas dark	It would be better to merge a couple, if not all, of these policies together as they duplicate elements of each other. Also why is residential not mentioned?	Duplication	Have an over-arching policy that include the 1 st sentence of para. 2.4.4., followed up by the key elements of policies DS2-4. Agreed and done.
	2 nd sentence - as previously advised, making such specific requirements can only apply in Conservation Areas. Also expecting lighting to be turned off at a specific time could be considered to be too restrictive e.g. overnight shift workers have different hours.	Accuracy & Implementation	Remove from policy, but include in the supporting text. Change policy title from 'built up' to 'conservation. This refers to Policy DS4. Change to conservation area. It is increasingly possible to expect lighting to be turned off or reduced in the middle of the night (part night lighting). Norfolk CC are already doing this in low crime zones. <u>https://www.norfolk.gov.uk/roads-and-transport/roads/road-maintenance/street-lighting/part-night-street-lighting</u> The policy can be reworded to specify the particular importance of the Conservation area, but this should not exclude other zones from a responsibility to reduce unnecessary or energy-inefficient lighting.
p26, POLICY DS2 Outside lighting	As a minimum, merge with the policy below as they cover the same issue e.g. new lighting on public buildings.	Duplication	As advised. DS Policies revised and merged.
	Reference 35 makes reference to CPRE Norfolk, but the policy refers to Norfolk County Council.	Accuracy	Need correct reference (if this relates to the approach to Street Lighting, this needs to be made clear). Clarified.

p26, POLICY DS3 Minimum requirements for new external lighting	See above. As previously advised, such a policy is likely to be considered too restrictive.	Implementation	As advised. Wording amended to 'ideally should' but essence remains in this policy revision.
p26, POLICY DS4 Lighting away from built areas	See above. As previously advised, such a policy is likely to be considered too restrictive.	Implementation	As advised. DS Policies revised and merged.
2.5 Housing and building			
p27, para 2.5.5	2 nd sentence - as previously advised, this needs editing to make it more accurate and use more appropriate phrasing.	Clarity	<i>"There is therefore no local government requirement for the community to identify land for development but new building and redevelopment remodelling, both by developers and existing property owners, is likely to can occur in the future and will be important for the social and economic viability of the community".</i> Revised.
p27, para 2.5.6	2 nd sentence – The text would flow better if the response rate was included in the 1 st sentence.	Clarity	<i>"Breckland's 2014 Housing Needs Survey (see the Evidence Pack), which had a 29% response rate reported that for younger people. The response rate of this survey was 29%."</i> Done.
p27, para 2.5.7	The need for affordable housing, and for such housing to be small, is welcomed.	This is in line with needs	No amendment required as it is essential to retain. Supported by SURVEY17.

		throughout Breckland.	
p28, para 2.5.10	<p>As previously advised, this paragraph does not take account of the existence of the '<i>rural exception site</i>' policy. This addresses many of the concerns in this paragraph.</p> <p>Such sites have been delivered, under the previous development plan, in Old Buckenham.</p>	Policy HOU 14- Affordable Housing Exceptions	Rewrite to reflect the existence of this policy which addresses many of these concerns. Done.
	1 st sentence – the use of the word ' <i>affordable</i> ' would be more appropriate, in planning terms, than ' <i>cheaper</i> '.	Phrasing	As advised. Paragraph rewritten.
p29, para 2.5.11	<p>1st sentence - it would be useful to demonstrate in % terms what the level of '<i>almost unanimous support</i>' was.</p> <p>Also this text would be better placed on page 14 to support policy LH3 on village layout.</p>	Clarity - this issue is not addressed in any policy in this section.	As advised. Stats entered.
p29, para 2.5.12 & 13	This text would be better placed in the chapter on ' <i>Traffic and parking</i> ' – see comments on Policy HB2.	Clarity	Must have reference in housing section, developed in T&P.
p29, para 2.5.14	It is not clear what is meant by ' <i>problematic</i> '. Are there any national or international designations that would add weight to this concern, as local or county designations would only provide limited weight in refusing development, aside from the area being in the open countryside?	Clarity	<p>Explain in more detail what the issue is.</p> <p>Text revised (now paras 2.5.16,17.) Done.</p>

p29, para 2.5.15	This whole paragraph needs checking, as the statements are not consistent with the Local Plan referencing.	Clarity	Check referencing in relation to the newly adopted Local Plan. Mainly GEN 01 and COM 01.
	Reference to Breckland Council's Design principles 2004 are out of date.	Clarity and relevance	Refer to National Design Guide https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf Wording revised and National Design Guide referenced.
p30, POLICY HB1 Housing types	1 st sentence - the policy makes reference to 'densities', but there is nothing in the policy, or evidence, that provides any guidance on this. Without this, this policy could apply anywhere and risks being removed by the examiner.	Clarity	Specific guidance is required in the supporting text about this issue. This should be referred to in the policy to guide what 'housing ... densities' are appropriate in New Buckenham. Reference to densities removed. Done.
	2 nd sentence - the wording needs rephrasing.	Consistency with text in para 2.5.7.	Also make reference to 'affordable housing', rather than 'less expensive housing'. 'More affordable' substituted. Done.
p30, POLICY HB2 Housing and car parking	Aside from this policy being more appropriately placed in the 'Traffic and parking' section, this needs to be re-phrased as an instruction to a Parish Council is not a land use planning policy (See comments re POLICY LH 1). Also there are just statements about this issue; there is no factual evidence or community view (or even photos) to justify this policy.	Clarity & Evidence	"As a result of tThe Parish Council's approach to parking will take into account the parking restrictions for requirements of existing residents and visitors, provision of and will look more favourably on proposals that provide off-street parking will be supported". HB2 removed and rephrased in TP 2. Done. Also provide evidence to support the above approach. Inherent in text.

p30, POLICY HB3 Change of use of commercial and business premises	While we support this policy in principle, as previously advised, there is nothing in the supporting text that either addresses how they 'should demonstrate' meeting these requirements or justifies the need for such a policy.	Evidence	Specific evidence is required in the supporting text to guide a developer or justifies the need for such a policy. Otherwise delete the policy. Policy deleted.
p30, POLICY HB4 Design of new building	2.5.19 – this would benefit from editing to make it more relevant to New Buckenham and planning.	Phrasing	<i>"Proposals ... should demonstrate how they respond to their settings, in light of the local heritage assets."</i> <i>"... to neighbouring buildings, perhaps the whole street if relevant applicable, and the surrounding landscape". Done.</i>
para 2.5.20	It would be useful to refer to the photographs showing building materials and styles, on the following page.	Clarity	As advised. Only possible by making illustration much smaller on same page or extending document by extra four pages (for printing). No action.
p30, POLICY HB5 Low impact access routes	Aside from this policy being more appropriately placed in the ' <i>Traffic and parking</i> ' section, the justification for this policy is missing. Also as previously advised, how should they ' <i>demonstrate</i> ' they relate to such routes e.g. some form of statement?	Evidence	Provide the evidence and clarify how this should be demonstrated or delete the policy. We firmly believe that this is a village where residents walk within it, so this policy is related to housing rather than traffic and parking.
p30, POLICY HB6 Encouraging sustainable development	1 st sentence – this currently duplicates the Local Plan policy. It would benefit to link the issue of sustainable development more directly to the issue of heritage in the 2 nd sentence.	Duplication	<i>"While nNew development will be encouraged, subject to other policies in this Plan. Careful, consideration should also be given to the impact of this on local heritage assets and buildings of local merit". Deleted.</i>

	Also as previously raised, what are ' <i>buildings of local merit</i> '?		
p31, 2.5.20 More modern village building materials and styles	This is a very good and useful example of the value of photographs in a neighbourhood plan.		Thank you.
p32, POLICY HB 7 Green living plan requirement	While we understand the desire for taking this approach, where is the justification for this policy? Also depending on the size of the development, this approach could have viability implications, which the NPPF allows for negating against.	Evidence & Viability	<p>Either provide the evidence or change to a community action policy. In SURVEY17 there was overwhelming appreciation and enjoyment of the environment and countryside in and around New Buckenham. We will give examples.</p> <p>Breckland Local Plan 2020 (para 5.10 + ENV 01) confirms that there is no district-wide green infrastructure study but commits to a more localised approach, seeking "to recognise the value of all green infrastructure and the contribution it makes to the local area in which it is located." Breckland is keen to advance the contribution it makes in terms of health, wellbeing, business and tourism (Local Plan para 5.10) as well as improving air quality, maintaining the soil and reducing flooding, but merely requires biodiversity advice be given to all developers and residents who submit planning applications. The advice will include items such as incorporating bird boxes and bee or swift bricks into housing plans.</p>
p32, POLICY HB 8 Boundaries	It is likely some boundary treatments could be built under permitted development and not require planning permission or other consent.	Regulations.	Add ' <i>Where an application for development is required...</i> ' at the start of the sentence. Rewritten.

	Also as previously advised, making such requirements can only apply in Conservation Areas.		
	The justification for this policy is missing.	Evidence	Provide the evidence or delete the policy. Following remarks above, Appendix 2 contains nothing that is unreasonable and is merely good practice. It lists items to which are alluded by Breckland. See Natural England's <u>Green Infrastructure Guidance</u>.
	Also this would benefit from additional text to add greater clarity about what is required.	Clarity	If evidence is provided: "... <i>provision always being made, such as the provision of gaps, for allowing ...</i> " Done.
p32, POLICY HB 9 Utilities and signage	Most of the items listed could be erected under 'permitted development' and therefore would not be affected by this policy.	Clarity	Add ' <i>Where an application for development is required...</i> ' at the start of the sentence. Policy wording revised.
P 32 Policy HB9	Also it is not normally appropriate to 'ban' elements in a policy, unless there is strong local evidence to justify this and this is supported by national guidance.	Evidence	<i>"Due to the impacts on heritage assets in the village, In new developments and alterations, there should be no new overhead..."</i> Agreed. Now in BT1. Done. Also outline in the supporting text what concerns there might be if erected and how the policy approach is justified in guidance. Add reference to heritage roof heights and miniaturising effect, cluttering esp. market place and on limited pavement widths

p32, Boundaries – some better than others for wildlife movement	Format - Additional labelling is needed to make it clear, which is beneficial and which is not.	Clarity	A couple of good and poor examples with text explaining this underneath. Photo captions amended.
2.5 Traffic and parking			
p33-35	To be consistent with the rest of the plan, the facts about transport and the issues (and public opinion) need to be separated out more clearly e.g. para 2.6.1 should come under the issues heading and para 2.6.2 (except the last sentence) and para 2.6.3, 1 st sentence, should come under the main heading.	Clarity	Review as advised. Agreed. Done.
	Also the 'Issues' section would benefit from some sub-headings e.g. Traffic, parking, buses; large vehicles, access, to address the issues more clearly.	Clarity	As advised. Traffic issues: paragraphs rearranged. Done.
p33, para 2.6.2	3 rd & 4 th sentences – it would be clearer if these two to sentences were linked together.	Clarity	As advised. Wording revised.
p33, para 2.6.3	1 st sentence - What is the evidence for the statement about ' <i>increasing car ownership</i> '?	Clarity	As advised. Wording revised.
	Also what is meant by ' <i>a rudimentary bus service</i> '? 'Rudimentary' perfectly describes the limited and barely adequate bus service.	Clarity	Move text from 1 st 2 sentences of para 2.6.9 to put this statement into context. Wording revised.

p34, para 2.6.11	1 st sentence - some of the wording amending to improve the phrasing.	Clarity	<i>"There are currently fewer lorries than before the recession but the large ones (40-44 tonnes) make up are now about 22% of lorries going through the village compared with 15% in 2007."</i> Revised and referenced.
	3 rd sentence - it is not clear why reference to 'farm vehicles' is included in the middle of the sentence, which addresses the issue of large lorries. If it is kept in, it needs further clarification.	Clarity	<i>"Large farm vehicles are more local to the area than large lorries, so (indicate why this issue is being addressed) although their technologies are less sophisticated".</i> Statement of fact but small revision made.
p35, POLICY TP 1 Highway developments	The policy needs to be developed to clearer about what is required.	Clarity	<i>"All development involving a public highway link should ... incorporate ... road surface characteristics that is 'in keeping' with similar to most of the rest of the village"</i> Have modified TP3.
p35, POLICY TP 2 Flashing speed signs	These are not a planning issue and should be changed to a Community Action. You could ask for contributions towards from new development, but this would only appropriate where there are 10 dwellings or more on a site.	Not a Land use policy.	As advised. Done
p35, POLICY TP 3 Boundary gateways	This is not a planning issue and should be changed to a Community Action.	Not a Land use policy.	As advised. Done.
p36, POLICY TP 4 Car park	The justification for the 'sustainable drainage system' is missing.	Evidence	Provide the evidence or remove this element of the policy. Traffic and parking policies have been revised. The NPPF refers to sustainable drainage systems in para 163 (b) and need not be reiterated.

2.7 Business and tourism			
p37-9, photos	Format - it would be useful to have some labels for the photos explaining what they are showing.	Clarity	As advised. The images are self-evident. Would only possible by making illustration much smaller on same page or extending document by extra four pages (for printing). No action.
p37-39, Para 2.7.3-2.7.5	To take the same approach as the rest of the plan, these paras should come under the issues section.	Consistency	As advised. Some rearrangement of paragraphs.
p40, POLICY BT 1 Communication s infrastructure	1 st sentence - this needs to be re-phrased, as an instruction to a Parish Council is not a land use planning policy (See comments re POLICY LH 1).	Clarity	"The Parish Council will support p Proposals to provide access to a super-fast broadband network to serve the village and other properties in the local countryside, will be supported". Done.
	2 nd sentence - It would be useful to clarify why this approach is being taken in the policy.	Clarity	"In light of the potential impact on the local heritage, Within the village, new overhead wires will be resisted. Outside the village any above-ground network installations, if essential, should be sympathetically chosen and designed to reflect the character of the local heritage, area. Done.
p40, POLICY BT 2 Better communication s for individual homes business	Such a policy may have viability implications, as it applies to all developments and there is no evidence for why it should be provided and not be overground.	Viability	Need to justify why all development should have this statement and why it should not be overground. This is addressed in para 2.5.24. Amend to: In the light of the potential visual impact on the Conservation Area the installation of new overhead wires will be supported where they follow existing overhead wire routes using existing poles or can be discretely located against buildings. Outside the Conservation Area any above-

			ground network installations, if essential, should be sympathetically chosen and designed to reflect the character of the local setting.
p41, photos	Format - it would be useful to have some labels for the photos explaining what they are showing.	Clarity	As advised. No room.
p41, POLICY BT 3 Support for business and tourism development	1 st sentence - this policy could apply anywhere, and would benefit from being more specific in relation to New Buckenham.	Viability	Give guidance on what type of business and tourism would be supported in the policy and the reasons for this in the justification. Deleted 'development' in policy title. Done. Add: Business and tourism development initiatives that support locally-based businesses (hospitality, healthcare, property services, transport, domestic support) and thus contribute to the economy, local employment and well-being of the village will be supported. New business proposals that support homeworkers, enhance tourism and the visitor experience within the village and conservation area will be encouraged.
	2 nd sentence - There is a need to outline how 'benefits' are expected to 'demonstrate' that they meet these requirements e.g. some form of Statement?	Evidence	Specific evidence is required in the supporting text to guide a developer or justifies the need for such a policy. Otherwise delete the policy. See comment above.
	Also development can't be refused for this reason.	Implementation	Either delete or rephrase "...development that does not demonstrate any such benefit to the village will not be supported be refused . Revised.

Community Action: Business and Tourism	The way these are worded comes across as an instruction to a Parish Council, rather than action that will occur or be considered.	Phrasing	Replace 'should' with 'will'. Done.
2.8 Recreation, health and culture			
p41, Figure 10 Public footpaths	The Key is also missing from the map and it would benefit from using a larger map.	Clarity	As advised. Unable to make larger than page margins. (Now Fig. 42).
p47, POLICY RHC 1 Social interaction and community life	The way this policy is worded, it supports a change of use (c/u) to a non-community use, as it does not qualify what c/u would be supported – this is what was intended? Either way, this needs evidence in the supporting text to justify the approach being taken.	Phrasing & Evidence.	Provide evidence for the approach being taken. Substituted with: <i>Development that enhances community life will be supported subject to other policies in the Plan.</i> Done.
	Also this takes a blanket approach to opening hrs, which may have a negative effect on neighbouring properties.	Extending opening hours could impact neighbouring amenity.	<i>"Development related to community use including ... alterations to permitted opening hours where express planning permission an application for development is required... at the start of the sentence. is required, provided it does not negatively impact the amenity of neighbouring properties' will be supported subject to other policies in this Plan. Reference to opening hours removed.</i>

p47, POLICY RHC 2 Local facilities	What does this add that is not already covered by the Local Plan?	Duplication	Either make specifically relevant to New Buckenham or delete Deleted.
p47, POLICY RHC 3 Reducing impact of loss of facilities	2.8.9 – This duplicates POLICY RHC 1 2.8.10 – This duplicates Local Plan Policy Com 04 2.8.11 – Remove the word ‘ <i>express</i> ’ as it is unnecessary.	Duplication	Delete Delete As advised. RHC policies have been simplified.
Community Action CA RH 2	It is not clear why this is here if it is already being addressed?	Clarity	As advised. RHC policies have been simplified.
5 Glossary			
Basic Conditions	It would be useful to explain what the Basic Conditions are and what they are for.	Clarity – see comments re p4, para 1.3.3	As advised. Done.
Evidence base	It is not clear why this is used as it does not appear in the rest of the plan.	Clarity	Either use in the plan or delete. Deleted.
Independent examination	Replace ‘ <i>third party</i> ’ with ‘ <i>independent</i> ’.	Phrasing	As advised. Done.
Listed Buildings	As outlined in the description for Conservation Area, it would be consistent to refer to the relevant legislation.	Consistency	As advised. Done.
Material considerations	These are factors, other than the development plan, that are relevant to a planning application	Clarity	As advised. Done.

Mitigation	It would be better to use the word 'mitigate' rather than 'Mitigation' as the latter is not used in the plan, where the former is.	Accuracy	As advised. Done.
Neighbourhood Plan	Suggest the word ' <i>development</i> ' is added in the middle to be consistent with the terminology in the rest of the Glossary.	Consistency	As advised. Done.
	Also some of the wording is not accurate and needs amending.	Clarity	<i>"A development Local pPlan prepared by a parish council and community representatives for a particular neighbourhood area, which includes policies on the use and development of land use topics".</i> Done.
Qualifying bodies	It is not clear why this is used as it does not appear in the rest of the plan.	Clarity	Either use in the plan or delete. Deleted.
Scheduled Monument	As outlined in the description for Conservation Area, it would be consistent to refer to the relevant legislation.	Consistency	As advised. Done.
Shared Space	It is not clear why this is used as it does not appear in the rest of the plan e.g. para 2.6.2 refers to 'space shared'. N.B. Also this is the approach used in a 'Home Zone',	Clarity	Either use in the plan or delete. Change to 'Space Shared'.
Site of Special Scientific Interest (SSSI)	As outlined in the description for Conservation Area, it would be consistent to refer to the relevant legislation.	Consistency	As advised. Done.
Stakeholder	If the word 'Evidence base' is not used in the plan, delete this as this word is not used anywhere else in the plan except the glossary.	Clarity	Either use in the plan or delete. Deleted.

Village Design Statement	It is not clear why this is used as it does not appear in the rest of the plan.	Clarity	Either use in the plan or delete. Deleted.
Appendices			
p48, Appendix 1, para 3.1.3	Would it be worth mentioning that this would be done for free, when the Local Authority are charging from April 2020.	Clarity	As advised. Done.
p48, para 3.1.4	This would benefit from additional wording to be consistent with the suggested policy rewording in Policy.	Clarity	<i>“An application that shows more detail about a proposed development’s impact on the setting on the street scene and landscape ...”.</i> Amended.
p49, para 3.1.9	1 st Bullet point - The use of the word ‘ <i>keeping</i> ’ would be more appropriate, in planning terms, than ‘ <i>harmony</i> ’.	Phrasing	As advised. Done.
	5 th Bullet point – Reference to “Lifetime homes” as an example of this would be useful.	Phrasing	As advised. Done.

Appendix 1: Complaints

Correspondence between Mr Stimpson and Parish Council 2018

September 27, 2018

New Buckenham Parish Council
c/o The Clerk

Dear Parish Council Members

Proposed Neighbourhood Plan

Unfortunately, although it was minuted that I would, I have not had a reply to my letter of October 2017.

1. I believe it to be the case that Claire Wright advised on planning and village development (as well as generally on the project). If so, then following the guideline on transparency of information, can I ask that the Parish Council please publish in full both the instructions/ brief, that was given to Claire Wright, as well as her report.
2. Can you confirm that the 'Breckland Housing Needs Survey' report was provided to Claire Wright, and that she was given the further background that I have previously offered to donate sufficient land on which to build the five recommended dwellings.
3. I am intrigued that a wildlife survey is taking place, with publicity specifically mentioning species that can be discouraging to development, which raises concern as to the objectivity of the work. I wasn't asked about access so as far as the section of the Parish north of Saint Martin's Gardens is concerned, the results will be restricted only to what can be observed from the public footpath or the road. Will the Parish Council please publish the report as soon as it is received?
4. The guideline I highlighted [Oct 3rd '17 at para 5] refers to the community having the final say. This has been transposed [meeting note 12th Dec. '17] as 'only residents would be able to vote', which is rather different. Surely 'Community' is everybody involved in the community? Can I ask that you address and I think amend this point in the interests of an inclusive approach? Is there any reason to *exclude* anybody from voting?, if so please explain why?
5. It remains my view that the future health of the village relies on providing sufficient new, energy efficient, well-spaced housing. Heritage has a place, but should not be used as an excuse to prevent growth. I am taking the opportunity to remind you (below) of what was explained in detail by Professor O'Riordan to a large audience in the village, not long ago.

Yours sincerely
Charles Stimpson

Note of Public Meeting 19th March 2016

1. On 19th March 2016 about ninety people took part in a Public Meeting arranged by the New Buckenham Society and independently chaired by an eminent

professor, Professor O'Riordan, very well connected with Norfolk and knowledgeable in sustainable rural communities. Many people spoke. By then it was acknowledged that no site for new social housing existed within the built village. (a specially formed working party had not been able to identify one) The professor highlighted;

- Difficulties faced by young people wanting to stay in rural communities
- The negative aspects of sucking young people out of rural communities
- The importance of providing mechanisms for young people to stay in rural communities
- A need to avoid development being focussed around a small number of selected hubs leaving rural villages isolated and dying
- The importance of providing new energy and water efficient housing
- The importance of regeneration of socially balanced economies (in other words encouraging younger residents in order to avoid the ageing of rural communities)
- The concept of 'incubator land' which is to build on, to pay for the future rented housing.
- The importance of paying attention to the needs of both the elderly and younger people

2. Other speakers at the same meeting highlighted;

- The high proportion of very old and many listed building houses in the village and the costs and access difficulties associated with these
- Growth in several directions has occurred relative to the medieval village
- Concerns about an ageing population in the village
- Social and economic changes in the village over time and difficulties in finding new people to run and participate in village activities and committees
- Risks of allowing the village to become a pretty, historic, dead monument
- The need for fresh input to maintain vibrancy
- To maintain village amenities and shops the village must grow
- The need for new, energy efficient, well insulated, accessible housing suitable for young families.

5 November 2018

Dear Mr Stimpson

New Buckenham Proposed Neighbourhood Plan

Thank you for your letter of 29 September, which was considered by the Parish Council at their meeting on 9th October. I have been asked to convey the Parish Council's response to your letter as follows:

Paragraph 1: Claire Wright has not been given a formal written brief, and has yet to report back to the Steering Group.

Paragraph 2: The Housing Needs Survey has been discussed at length with Claire Wright, who has been supplied with a copy of the document.

Paragraph 3: The notion that specific wildlife species might discourage development and that publicising such species biases the survey seems odd. The purpose of the wildlife survey is to gather evidence as to which species actually are present. The Parish Council await its findings with interest. The Council is not aware that access to any land owned by yourself was required by the survey.

Paragraph 4: Paragraph 14 (4) to schedule 4B of the Town and Country Planning Act 1990 (as amended) states that:

“A person is entitled to vote in the referendum if on the prescribed date—

(a) the person is entitled to vote in an election of any councillors of a relevant council any of whose area is in the referendum area, and

(b) the person's qualifying address for the election is in the referendum area.”

Paragraph 5: Your comments on housing represent a valid viewpoint and have been noted. The Neighbourhood Plan will need to take into account the views of all stakeholders.

Yours sincerely

Trevor Wenman

Clerk

Correspondence between Mr Stimpson and Parish Clerk 2020

This letter was received as part of the formal pre-submission consultation and appears with other comments but as it contains points of complaint it is included here followed by the Clerk's response.

February 13, 2020

New Buckenham Parish Council

c/o Trevor Wenman

Clerk to the Parish Council

Dear Trevor, Parish Councilors,

NEW BUCKENHAM PARISH COUNCIL'S PROPOSED NEIGHBOURHOOD PLAN

1. This is my response within the consultation about the proposed Plan “the proposal”. I have copied this letter to the Breckland Council Monitoring Officer because some of the points are a complaint about the Parish Council.

2. The Parish Council “PC” collectively has a duty to champion the needs of the whole community equally and anybody who may be affected by the proposal; it remains responsible throughout for the proposal.

3. The proposal is a plan that would be binding for a very long time, until at least 2036, and pretty well impossible to alter. In that time our living circumstances and needs will change enormously. Those in the future of the area affected will not thank today's community for a plan that restricts decisions in ways not yet foreseeable. My overall view of the draft is that it binds the current and future as yet unknown community far too tightly.

4. It potentially empowers people who are not yet part of the community. It could actually discourage people from coming into the community in the future if the plan area is seen as over controlled and too expensive. Taking care of the village and surroundings is a very worthwhile intention but the proposals go too far in seeking to fulfil that aim.

5. Scope of consultation

6. The PC allowed a survey that excluded those responsible for 90% of the area affected. Until the survey took place there was wide publicity stating that a survey would happen and everybody would have a chance to put their views.

Neighbourhood Plan = ‘Neighbourhood’, not just the village. Nothing was said to explain that in fact, when it eventually took place, the survey would only allow selected participation. A portion of the community that has become referred to as The Landowners found without prior notice that they had been excluded from the survey and prevented from participating in it.

7. The PC's letter to me [23rd September 2017] confirms, amazingly, that the decision to exclude a portion of those affected was intentional.
8. It was clear that at the time of the restricted survey, the PC had not even compiled a list of who should be canvassed. 'Results' of the survey were even published, and yet those responsible for 90% of the land area affected by the proposal had not been identified or contacted at that time at all. The opportunity to include everybody was missed and that avoidable exclusion has created ill feeling.
9. I am attaching a re-print of the Survey17 "S17" questionnaire and for comparison the questionnaire that was eventually circulated to landowners in October 2018, about eighteen months later. This following proposals stated in the working party's minutes dated 16th January 2018 that it *"felt it was unlikely that representatives of this stakeholder group [Landowners] would be available to come to a meeting in the village"*. They were never asked. Several of them were never even found. This further demonstrates the vastly reduced involvement allowed for the landowners. Quite a few live not far away or like me are in the village often.
10. There should never have been a situation where those responsible for such a large proportion of the area affected were treated separately as 'The Landowners' and secondary consultees, all 'those potentially affected' ought to have been included in S17.
11. The restricted/ invited survey, S17, for completion by those responsible for about 10% of the area affected, contains over 30 questions, offering multiple choice options for expressing views and opinions on a broad range of topics, whilst the landowners, responsible for 90% of the area affected, were asked only four short questions, seeking information about their affairs with only two of those offering scope for expressing other views and opinions.
12. On 5th November 2018 the PC wrote to me and stated that the legislation is such that only those registered to vote in the area affected by the proposal, are entitled to vote in an eventual referendum. In the circumstances that is the case then surely the PC could have taken even greater care to ensure the equal and simultaneous inclusion of everybody, whether entitled to vote in a referendum or not. That would have shown an inclusive intention from the outset and a greater chance of the whole community being agreeable to the outcome.
13. In fact, the method adopted seems to have prioritized the interests of somebody who for example rents short term accommodation in the village and registered on the voters role, over and above the farmers and landowners who in many cases have several decades of involvement with the area. There should have been no prioritizing at all. Somebody renting a home for a few months who might have moved on anytime, (S17 was nearly three years ago) or who has only recently moved into the village, has been offered greater input to the proposal, which concerns my land, than I have!! There is at least a three year gap between S17 and any chance of a referendum! Some referendum participants, should one eventually take place, will not have taken part in S17.
14. S17 includes a number of questions that are obviously to do with the land and its use, and yet the PC chose to exclude the owners of that land from setting out their views at the same time and in the same way. No farmer or owner of land in the proposal lives in the plan area, the farmer's commercial knowledge of the countryside as a living agricultural workplace, will likely be entirely different from those who were allowed to complete S17, who are clearly invited instead to express more leisure based views of the proposal area outside the built village. Their focus of interest is very different. They were even invited to express views about what sort of crops might be grown!!
15. Many of the questions in S17 can be read as leading. I understand there was no independent review of S17 before it took place. Particularly leading are a number of the questions about land use and countryside. Had those who own and farm that land been fully

included from the start, (and/ or had their promised Focus Group) the outcome might have been different. The proposals seem oblivious to the challenges faced by farmers and landowners.

16. Several of the landowners I have spoken to had never heard of the proposal until I told them about it in late 2018. By contrast those invited to participate in S17 were notified by village publicity, posters, and so on. The February '20 Parish News states a copy of the draft was delivered to every household but none was provided to the landowners who appear to have been excluded from the consultation (which will affect their land i.e. 90% of the land area of the proposal) unless like me they happened to see the release mentioned in the Parish News and go to the open morning to obtain a copy. This is a further example of the sidelining of the landowners interests. Which may not comply with the requirement that 'everybody is kept fully informed of what is being proposed'. It is well known that several of them live some way away and, obvious by their exclusion from S17, none of them live in the village.

17. In my reply to the land owners' consultation, copied to every PC member, I asked if a representative of the land owners, being 90% of the area affected by the proposal, could be appointed onto the working party, this might have gone some way to address, even at that late stage, the chasm between S17 and the landowners involvement. I had no reply. This appears to be non-compliant with the requirement that the 'wider community....has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order', which is not the same as being allowed to review the draft later on. The landowners were not afforded the anonymity offered to others.

18. It would have been perfectly possible to first of all establish a list of those who would be affected by the proposals and only then survey them all at the same time, irrespective of the residents only being eventual voters. Instead the decision to treat separately those responsible for the land in the plan as merely 'other consultees' unfairly excluded them. The PC could have avoided any difficulty by adopting a different approach but chose not to. S17 seems to have been undertaken prematurely.

19. The PC did not require any formal external advice at the outset. Only on 12th December 2017, several months after S17, was an adviser introduced. A note of that meeting states that the landowners would be treated as a Focus Group. In fact this never happened and landowners were not contacted at all until 30th October 2018. If they had been included in S17 they may not have needed a Focus Group anyway.

20. The shape of the village and its heritage.

21. The draft proposal explains the view that the village is a well preserved ancient settlement, reflecting its shape as originally brought about in the 1200s. It evidences the Town Moat as an important aspect. The well-known work of the late and respected Paul Rutledge is mentioned. In fact however, Mr Rutledge's work also states that the alignment of the Moat is largely speculative and assumed. He also mentions there is very little documentary evidence of the early settlement.

22. The draft states [para. 2.5.2] that development has been within the Moat with few exceptions, however, my research, already on public record, (Selby 2016) shows that over 64 houses are on or outside the assumed line of the Moat. The draft mentions 209 households [2.5.2] so it seems that in fact as many as 30% of the current dwellings, some several hundred years old for example the Vicarage and Thatched Cottage, are on or outside the assumed alignment of the Moat!!

23. Mr Rutledge's work also mentions that the moat was being ignored and filled in by the 1600s and consent was given for a barn to be built on it [Gosling] in 1630. Also, take up of the land in the moated area was actually quite slow, and the land to the North West corner including that now occupied by St Martins Gardens was never built on at all. Its occupant was sanctioned for the derelict state of it at one time. It was a vacant meadow until 1963, by which time it had been ceded back to Old Buckenham. Early New Buckenham never extended to fill it and it only

later became within New Buckenham parish by a subsequent re-alignment of the parish boundary, (1960s).

24. Pevsner (1962, almost 60 years ago) mentions 'This little town has preserved its layout' and goes on to describe the street alignment but not, as often claimed, the overall shape and size of the settlement. In the many years since much more building on the perimeters has taken place. Selby's report of 2016, details mapping and growth that confronts the wide belief that growth has not taken place. I wonder how many of the people who believe that, have ever looked at the information in any detail?

25. My point here is that one can read the historical information to produce an outcome favorable to a range of circumstances and it is risky to claim as a defining fact any one of these various interpretations of the available material. With that in mind the draft should be amended, because that aspect is a major foundation of the growth and development restrictions that the draft ultimately seems to me, to prefer.

26. There are important heritage features but they could be at the central focus of a village where some further growth is allowed because without it the village may become 'A pretty, historic, dead, monument' [a speaker at the 19th March '16 village meeting].

27. Reports obtained contributory to the proposal.

28. The proposal is fundamentally about planning and development. Dec '19 / Jan'20 Parish News at page 16 states the proposal came about following a public meeting held (on 19th March) 2016, about new building.

29. Funding was secured for the engagement of a Planning Consultant. Claire Wright was introduced to the meeting on 12th December 2017 as a Planning Consultant. At the Parish Council meeting on 9th April 2019 the meeting was told that the Planning Consultant's report was not yet available because she had been poorly, but the PC seems not to have insisted on this clearly very important report being with the Evidence Base. A note of the working party's meeting dated 16th January 2018 states that £3925 funding was secured towards work including a 'Town Planning Adviser' but this report seems not to have been produced?

30. Further observations on the draft proposals

31. Wildlife

32. A wildlife/ecology report was obtained. The PC confirmed to me [letter. 5th Nov. 2018] that the consultant had not required access to any of my land. I have commissioned two wildlife/ ecology reports, i. Land at The Allotment Field (2016) and ii. Land west of Cuffers Lane (2019), both on public record at 3PL/2016/0636/0 & 3PL/2019/0301/F. Both consultants did go over my land. In neither case has the presence of any species been identified, although potential habitats are identified nearby. The draft states [2.3.7] that Great Crested Newts are present but the wildlife/ecology report states [p.23] 'no record of Great Crested Newts or breeding ponds within 2km'. Bats are said to be present, many species identified but the reports I commissioned only identified likely habitat. [2.3.8] states that no formal ecology studies were done until now but I mention above two I have provided recently. [2.3.9] states the new report is for the first time in history, so there seem to be several points here that need correcting.

33. There is wildlife all over the countryside and BNG, see below, addresses it. It should not be a barrier to development [2.3.11] [2.3.14] but instead an opportunity. 'Protecting' should not mean stopping anything happening.

34. The draft [2.3.17] ought perhaps to mention Biodiversity Net Gain 'BNG' which is the balance, now a requirement in modern planning, that new development must show a 10% gain in biodiversity, for example for habitat, and referencing species impact and so on. Opportunities for development within the existing envelope are limited and will soon crowd out, so a preference against village growth is negative to habitat protection and counterproductive to the

now standard requirements of BNG. I think the draft is off target so far as BNG is concerned and should re-consider any focus towards more houses within the existing envelope, missing the important opportunity to further its own preferences and aims.

35. Other issues

36. There seems to me to be a clear preference from the draft, against further development of the village. This means that in order to address the imbalance of few modern, fuel efficient, well insulated houses with good parking and suitable for elderly people or for young families, (per. O'Riordan), the only possibility is of more infill into the few remaining existing gardens. This approach is in my view short sighted. It stifles and crowds a thing the whole project seeks to preserve, which is the heritage of the existing village. Space will soon run out for new dwellings. I think there is too much emphasis on the perceived boundary of the assumed 'Moat' whereas it would be perfectly possible to continue featuring the heritage assets whilst allowing some careful growth of the overall envelope. The public opinions as at 16th March '16 are set out in my letter to the PC of 29th Sept. '18.

37. The draft states [2.5.5] that the settlement is unsuitable for future growth citing HOU 02, but the section omits policy HOU 05 'Small villages and hamlets outside settlement boundaries' which offers wider scope. [2.5.5] seems to present an incomplete picture of the relevant policies.

38. [2.5.6] seems to imply that the Housing Needs Survey written by Breckland is now superseded by S17, but Mr Heaton, the Breckland Officer who wrote the Housing Needs Survey report considers the findings are still relevant. Social housing is a relevant aspect of community mix especially where limited rental property is available. A PC working party in 2016 was unable to find any sites in the village for social housing.

39. [2.5.10] omits to mention the still available donation to the village of the land for the five affordable houses recommended in the (still valid) Housing Needs Survey, which could be added to the Almshouses portfolio or Parish Council owned to control occupancy and the concern that they would find their way into the open market. Despite reminding the PC of this the point has been omitted from the draft.

40. [2.5.11] sets what is really an impossible bar in a requirement to demonstrate no harm in 'rounding off', who decides?

41. [2.5.12] really means no more development should be allowed at all inside the existing envelope unless off road parking can be provided, but even that brings more cars because households have extra cars and visitors to that new dwelling bring them as well and park in the street. Village parking gets worse the more houses arrive in the envelope. More houses plus more off road parking will rapidly deplete the remaining village garden space and green gaps, and the wildlife it accommodates.

42. [2.5.14] seems to ignore the now standard requirement to allow for 'BNG' so the statement is not really valid, implying that the presence of wildlife is grounds for not building around the village. BNG provides a balance and can create more green spaces and wildlife corridors. My recent farm building planning consent includes hedging, a Skylark area and bat boxes that were not there before, for example.

43. [2.5.15] and [3.1.3] seem risky because they suggests the PC might have an early bite at considering a planning application, but the PC has very limited knowledge of such matters so how should it decide? The point was perfectly demonstrated by my recent (and ultimately successful) application for a farm building that the PC objected to on the grounds of 'disproportionality to the acreage of the holding' but it was completely unqualified to make such an assessment (none of the PC are farmers) or use that as grounds to object. The para. seeks to imply that the PC might become a pre-application panel? The idea has potential but the powers it implies should be very much toned down. The PC is not a Planning Authority and

should not seek to become one. There is no way to predict what the PC might even be like in future years.

44. [2.6.5] Cuffers Lane is also used by farm traffic and the bin lorry that routinely goes that way, in addition to delivery and other traffic. Is it a perfectly serviceable if narrow public highway in regular use connecting to Old Buckenham and other local communities.

45. [2.7.12] on the one hand suggests support for tourism based development but at the same time gives reasons why it could not in fact happen. Who would decide as to 'demonstrate a benefit to the village as to economy environment and landscape'? This viewpoint could very easily be used to block any tourism based development so perhaps requires amendment. The recently announced closure of The George is a clear indication that anything reasonably possible should be done to improve the footfall potential of tourism rather than identifying reasons against it.

46. [2.8.1] refers to the magnificent church whose custodians have in recent years expressed concerns about falling congregations and this ought perhaps to be addressed by strongly promoting it as a performance and meeting space. CA RHC 2 supports this so could it be cross referenced?

47. Policies LH1 to 4 [2.2.11 to 14] could easily be used to prevent any building, LH3 in particular places a complete block on growth which is unwise and not in line with HOU 05. These should all be revised and softened in light of the comments made elsewhere. LH4 assumes the whole settlement was designed, for which there is no evidence base. Demonstrating a 'positive impact' as in LH2 is an objective criteria, who decides? These policies as currently drafted are far too restrictive and will cripple the future of the village.

48. Policy CE1 and 2 [2.3.17 to 20] are covered by BNG policies and are again easily useable to block village growth or conversion which is unwise so they should be softened or revised altogether. If Cuffer Lane 'and margins' is considered suitable for inclusion then so should Castle Hill Road and margins especially as the land between the Vicarage and Castle House is in the Conservation Area as well as being 'Scheduled Land' and outer bailey of the Castle. I suggest a 'view to be preserved' marker (per. Fig. 6) should be added to highlight this very important historical outlook.

49. Policy DS4 [2.4.8] 'annoyance to local residents' is a guideline that could easily lead to objection and is too limiting. Perhaps the topic could be covered by wording suggesting a preference for time controllers?, for example. Equally DS3 seems to provide extremely restrictive rules which ought perhaps to be re-worded less tightly. Perhaps DS4 could be modified to include the words 'externally mounted'?

50. HB6 [2.5.22] 'buildings of local merit' seems rather vague. The existing 'Listed Building' registration is perhaps a suitable qualifier here? Who would decide/ is anybody local qualified (into the long term future) to assess 'merit'? Perhaps this kind of vague wording lays open a floodgate for multiple objections?

51. TP1 [2.6.15] can I suggest this is re-worded as 'new development access routes should, for the benefit of pedestrians, match or retain the surfacing of any existing or immediately adjacent pavement'. The policy is otherwise open to endless debate.

52. BT3 [2.7.12] who would assess this benefit? The policy seems too tight and could easily be used to block any tourist based development. It states an encouragement but identifies issues that could far too easily stifle such applications.

53. CA BT 4. Ought this not to explain more, what is a Community Asset, what would this mean to an owner of private property? Perhaps the Glossary could be amended to address this?

54. [3.1.6] and [3.1.9] are perhaps from O'Riordan (housing for older and younger people)? and ought to be welcome but given these both groups probably need cars it is very hard to see how they could be incorporated without carving up yet more gardens within the existing built village, and yet preferences are identified elsewhere against growth of the envelope, so the preference

in this paragraph will soon be unachievable unless other preferences set out in the draft are relaxed to accommodate it.

55. The NOMIS report states there are 122 residents between 65 and 90+ years of age, out of 460 i.e. 26.5% ($\frac{1}{4}$) of the population is over 65. It also shows 79 persons up to the age of 17, (17%), leaving 56.5 % in the middle age band 18 to 64, slightly more than half. S17 results show only 26% of residents were in full time employment ($\frac{1}{4}$). The proposal rightly supports more smaller houses, but they must be available at manageable prices. [2.5.9 : Mr Beales] states house prices are higher in the village so to keep some within the reach of a moderate budget more will be required. It is as simple as that, or the village will become only occupiable by those with generous means. Plots sliced off gardens will be increasingly expensive.

56. Infilling means driving up the price of houses with potentially developable gardens, so making them even less affordable. A theme seeming to limit growth of the village creates a windfall for those owners. Any suggestion against village growth therefore seems to me a highly undesirable theme to be promoting and will further skew the price and affordability of village properties towards those with higher budgets which is not healthy for the future mix of village occupants. This suggests a serious re-think of the draft may be worthwhile.

57. I suggest a policy should be added requiring payment of a proportion of the land value (valued with Planning Permission if granted) to the village of any plot created out of an existing garden or Conservation Area, payable to the High Bailiff's Trust, in order to discourage cramming more houses into the village and to enable the village to enjoy a portion of the windfall from such development. This will also discourage more building into green gaps that now exist between houses.

58. I also suggest that as a part of this Neighbourhood Plan for the future of the village and surrounds, a review of the older and now depleted charities in the village, so they retain their identity, to be brought within the High Bailiff's Trust towards maintenance and management of the publicly owned heritage assets.

59. The profusion of very old houses is agreeable if you purchased one many years ago but less attractive now if you want to heat, alter, insure or maintain one on a modest budget. They are cold, hard to heat and improve and costly to mend.

Modern well insulated energy and fuel efficient houses are essential, (per. O'Riordan) which the proposal identifies but there do seem to be wide reasons advanced as to why they cannot easily be provided?

60. [3.1.9] recommends that development should be proportionate to plot size, but if the overall preference is of no village growth then plot size is limited to remaining gardens so ever more crowding and depletion of gardens which seems counterproductive to the preservation of the ancient village?

61. [3.1.9] last bullet point, seems an obvious block to growth and perhaps existing overshadowing guidelines already cover the point.

62. Appendix 1. [3.1.1] Could this be re-worded to apply to 'The Plan Area' so as to include the portions of Old Buckenham that are in the proposal.

63. Practical Observation; Ponding of water at the junction of St. Martins Gardens is probably because when Mr. Brewster's yard was redeveloped, the drain under it that ran to the ditch behind the Grange, was truncated and the problem could very likely be alleviated if a new drain were laid under what is now called Moat Lane to the section of Moat referred to, thus restoring it to a water holding wildlife haven next to the popular footpath.

In summary my points, including some that are a complaint, are;

64. The PC did not ensure the proposal involved everybody equally; in fact it endorsed the landowners' exclusion, despite in my case writing a whole year beforehand asking to be

included. Many landowners said they heard nothing about the proposal and never had the questionnaire; insufficient steps were taken to see that the land owners had received notification. This exclusion serves to discourage positive involvement of the landowners and instead generates ill feeling and a negative view towards the project that affects and involves their land. The approach was in my view a serious mistake.

65. The consultation that was eventually extended to the landowners was entirely different in scope and nature to S17.

66. My request/ suggestion (November 2018) that a representative of the landowners should be included in the working party was ignored. The landowners' Focus Group never happened. Some of them have a lifetime and generations of involvement in the proposal area.

67. The PC ought not to have allowed anything that might be seen as prioritising the interests of some of those affected over others, the opportunity for real inclusivity was unfortunately missed.

68. A very important report that the parish council meeting on April 9th 2019 was told was merely delayed by ill health, and for which funding was earlier approved, has not in fact been produced at all so the report of a 'Planning Consultant' is absent from the Evidence Base.

69. I have responded to the consultation generally with various points on the draft and policies it sets out and made what I hope are some useful suggestions. I therefore request the project is put formally on hold while the Breckland Monitoring Officer considers the matter. Some of what I mention might have come out earlier had there been full engagement with the land owners. My viewpoint is that of forth generation New Buckenham community involvement and landowner in the plan area for almost 60 years. Some may read my letter as a desire to develop my land, it should not be seen as such, but rather an expression of genuine concern about these proposals.

Yours sincerely

Charles Stimpson

18th March 2020

Dear Mr Stimpson

New Buckenham Neighbourhood Plan

Thank you for your letter of 13 February. The Parish Council considered your letter at its meeting on 10th March 2020 and has taken advice from the Neighbourhood Plan Working Party and Breckland District Council on the specific issues you raise in your letter regarding the Parish Council's role. I have been asked to respond to your letter on behalf of New Buckenham Parish Council.

Comments on the Plan

Your comments on the Neighbourhood Plan are welcomed, as are all the others received during the Plan's pre-submission consultation. They are currently being reviewed by the Neighbourhood Plan Working Party and will be published in due course on the Plan's website www.np4nb.online. The working party will modify the pre-submission Plan as needed in the light of all the comments made.

Complaints regarding the Parish Council's Role

You complain about the process taken in developing the Plan. The survey conducted in 2017 was designed to seek the views of residents. National guidance from Locality makes it clear that "The whole point of a neighbourhood plan is that it is community-led and that means reached, written and voted on by the people who live in the neighbourhood..." (p5, Neighbourhood Planning Community Consultation).

It also states the need to 'Identify key local partners and stakeholders' and one of these groups identified are "Landowners of key sites". For landowners, the working party sent a targeted questionnaire that asked the following:

1. A request for the landowner to identify his or her land (map supplied)
2. "Are you anticipating, or do you hope for any change of use for this land?"
3. "Please let us have any further comments and views about land use within the area designated for the Neighbourhood Plan"
4. "Are there any other issues you believe should be considered in planning New Buckenham's future?"

The questionnaire was accompanied by an explanatory letter. The questions gave an opportunity for landowners to comment on their land's future use and any other comment they wished to make about planning the village's future.

You are correct in saying that the working party had planned to have landowners in a focus group, as recorded in the notes of its meeting on 12 December 2017, but in light of the comments received from the landowners it was not felt necessary to arrange a meeting.

In your complaint you also mention the absence of a town planning report. A town planner was engaged to give general advice to the working party, answer subsequent queries and prepare documentation such as the Basic Conditions Statement, but no report was commissioned. I understand you were advised about this by the Working Party representatives when you attended the consultation launch on 21 December last year.

In preparing the Plan the working party (and through it, the Parish Council) has been guided by the legislation and regulations, a range of national guidance and has taken advice from officers of Breckland Council.

There is nothing in the legislation or regulations to say how a Parish Council should produce a Neighbourhood Plan other than whom to consult and the statutory documents that need to be submitted to the Local Planning Authority, such as a map or statement which determines the Neighbourhood Plan area. Similarly there is nothing in the regulations about holding up the Plan for the reasons you have described.

The Parish Council, therefore, finds no substance to your complaint that the Council has failed in any aspect of its oversight of the work of the Neighbourhood Plan Working Party or of the Neighbourhood Plan process. It also finds no justification for suspending the Plan process (and thereby preventing the Working Party from considering the many comments received on the draft plan – including your own).

Yours sincerely

Trevor Wenman

Correspondence between Mr Stimpson, George Freeman MP's office and Parish Clerk 2020

From: George Freeman <george.freeman.mp@parliament.uk>
Sent: 17 November 2020 17:26
To: parishclerk@newbuckenhams.net
Cc: Joanna.Elks@breckland.gov.uk; stephen.askew@breckland.gov.uk
Subject: (Case Ref: ZA18996)

Dear Trevor,

George has been contacted by a Mr Charles Stimpson – who he understands is a landowner in New Buckenham with a registered address, but primarily lives away in Kent.

As George is certain the Parish Council will already be aware, Mr Stimpson has concerns with the Neighbourhood Plan process that the village is currently undertaking and he has asked that George share the attached letters with yourselves and both Cllr Stephen Askew and Breckland Council. (I have copied both Steve and the Council in so that they are aware)

George would really appreciate if you could pass the letters to Karen and the team and take a look. Any more info that can be shared with him would be really helpful and if he could have an update on the Parish Council's position in relation to Mr Stimpson so that he can better understand the situation, that would be great too.

Best wishes,

Tom Fenwick
Constituency Office Manager for George Freeman MP
MP for Mid Norfolk

From: parishclerk@newbuckenhams.net <parishclerk@newbuckenhams.net>
Sent: 01 December 2020 10:59
To: 'George Freeman' <george.freeman.mp@parliament.uk>
Subject: RE: (Case Ref: ZA18996) Letter from Charles Stimpson – New Buckenham Neighbourhood Plan

Dear Tom

Thank you for your email of 17 November. I apologise for the delay in replying.

New Buckenham Neighbourhood Plan is being prepared by a working party set up by New Buckenham Parish Council

Mr Stimpson made his formal views known in his comments to the Neighbourhood Plan's formal Pre-submission Consultation that occurred under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 in February 2020. The Parish Council's responses to these comments, and those of other residents and statutory consultees, have been prepared and will be published at the formal Submission stage (Reg 16), as part of the Consultation Statement. All comments received have already been considered during the preparation of the Submission version of the Plan.

The survey in 2017, mentioned by Mr Stimpson, was specifically designed for residents as it largely covered matters of importance to local residents. Local landowners were given the opportunity to get involved with their own later questionnaire that asked about matters of specific relevance to them. This included the open question: *"Are there any other issues you believe should be considered in planning New Buckenham's future?"* which gave landowners an opportunity to make their views heard.

In preparing the Plan the working party (and through it, the Parish Council) has been guided by the legislation and regulations, a range of national guidance and has taken advice from officers of Breckland Council. Furthermore it has taken advice from specialists in conducting surveys and public engagement.

There is nothing in the legislation or regulations to say how a Parish Council should produce a Neighbourhood Plan or carry out public engagement other than whom to consult and the statutory documents that need to be submitted to the Local Planning Authority.

Breckland Council has voiced no concerns about the Parish Council or Working Group not meeting any of the regulatory requirements.

Any further concerns about the **consultation element** of the Neighbourhood Plan, can be addressed by making comments on the Consultation Statement which is one of the documents that is issued for consultation at the same time as the consultation on the Submission version (Reg.16) of the Neighbourhood Plan.

Any concerns about the **Neighbourhood Plan itself**, may be addressed by making comments during the public consultation when the Submission Version (Reg 16) is issued. Once received by Breckland Council, all the comments will be sent to the Independent Examiner to consider, along with other required documents, as part of the Examination. It will be at this stage that a view is taken by the Independent Examiner about the Plan.

Neither of these have yet been issued and there will be an announcement when this happens by Breckland Council, as well as in the Parish News and on the website www.np4nb.online.

Please do contact me again if you need any further information.

Regards

Trevor Wenman BA
Clerk to New Buckenham Parish Council

From: George Freeman <george.freeman.mp@parliament.uk>
Sent: 02 December 2020 16:37
To: parishclerk@newbuckenhham.net
Subject: Re: (Case Ref: ZA18996) Letter from Charles Stimpson - New Buckenham Neighbourhood Plan

Dear Trevor,

Many thanks for this. I've passed this to George – who really appreciates it and thanks you for setting everything out so clearly. He's going to update Mr Stimpson shortly.

Best wishes,

Tom Fenwick
Constituency Office Manager for George Freeman MP
MP for Mid Norfolk

Correspondence between Mr Stimpson and Breckland Council 2020

From: Smith, Teresa [<mailto:Teresa.Smith@breckland.gov.uk>]
Sent: 10 February 2020 12:10
To: 'Stimpson Survey'
Cc: Democratic Services
Subject: RE: Parish Councils - complaints

Good Afternoon,
Thank you for your email.

If you wish to make a complaint regarding a Parish council, the information can be found on the Breckland Council website at: <https://www.breckland.gov.uk/article/3356/Make-a-Councillor-complaint>

However, I have for your information attached a copy of the Guidance on making a complaint, together with a complaint form. Therefore if your complaint is something that can be considered by the Monitoring Officer, please complete the form and return to standards@breckland.gov.uk

Kind regards,
Teresa

Teresa Smith | Democratic Services Team Leader | Breckland Council
DDI: 01362 656295 | Mobile: 07464 900987
www.breckland.gov.uk

From: Stimpson Survey <info@stimpsonsurvey.co.uk>
Sent: 17 February 2020 15:49
To: Smith, Teresa <Teresa.Smith@breckland.gov.uk>

Cc: Democratic Services <DemocraticServices@breckland.gov.uk>

Subject: Parish Councils - complaints

Dear Teresa Smith

Thank you for your helpful response last week. Peter Fuller has mentioned that this has been passed to you to deal with, my email may have already been forwarded to you but in case not, here it is with the important attachments. I am afraid my letter to the Parish Council is not short but it raises a considerable number of concerns about the proposed Neighbourhood Plan and how the draft has come about. There is a consultation underway but my concerns are certainly not merely confined to point raised under that process. The first thing to look at is my letter 'Ltr. Consultation. MBPC [R.5] 13-2-20'. I haven't completed your form but everything you need is in the letter.

--

The Monitoring Officer,
Democratic Services,
Breckland. Council,
Elizabeth House,
Walpole Loke,
Dereham,
NR19 1EE

Dear Sir

New Buckenham Parish Council is progressing a proposed Neighbourhood Plan. I have concerns about the way the consultation was carried out and the fact that some of those affected were excluded from a survey and treated in a very different way, some considerable time afterwards.

I have responded to the Consultation in the attached letter. The first section of which 'Scope of Consultation' at Para 5, sets out the concerns that represent my complaint. Some further issues of concern arise in the body of the letter but much of it is a Consultation response.

The points of complaint are also explained in the summary at the end of the letter.

I would be glad if you will review the matter and in the first instance let me know you have received it and some idea of timescale. I have requested the proposals are put on hold while your review takes place, if you agree this is appropriate, please let me know and you can contact the parish clerk Mr Trevor Wenman at [Trevor Wenman parishclerk@newbuckenham.net](mailto:Trevor.Wenman@newbuckenham.net). I think it would be inappropriate for the proposals to carry on while there are such concerns about the process so far which I am asking the Monitoring Officer to look at.

Many thanks

Yours sincerely

Charles Stimpson
Ph. 01732 838418. Mb. 07919 592106

From: Smith, Teresa <Teresa.Smith@breckland.gov.uk>
Sent: 18 February 2020 12:04
To: Heinrich, Susan <Susan.Heinrich@breckland.gov.uk>; Wood, Simon <Simon.Wood@breckland.gov.uk>
Cc: 'Stimpson Survey' <info@stimpsonsurvey.co.uk>; 'parishclerk@newbuckenhham.net' <parishclerk@newbuckenhham.net>
Subject: FW: Parish Councils - complaints
Importance: High

Good Morning,

Please find below an email received from Mr Stimpson regarding concerns with the Neighbourhood Plan at New Buckenham Parish Council.

This had come through as a Standards complaint, but on reading the letter and speaking with Mr Stimpson, it will not be progressed through the Standards process, as it is issues with the Parish Council as a whole.

Please could I ask you respond to Mr Stimpson directly regarding his issues.

Many thanks

Teresa

Teresa Smith | Democratic Services Team Leader | **Breckland Council**

DDI: 01362 656295 | **Mobile:** 07464 900987

www.breckland.gov.uk

Heinrich, Susan <susan.heinrich@breckland.gov.uk>

To: 'info@stimpsonsurvey.co.uk'

Cc: Darcy, Andrew, Wood, Simon, 'parishclerk@newbuckenhham.net', 'info@np4nb.online'

Tue, 25 Feb 2020 at 17:05

Charles,

This is to clarify Breckland Council's role in relation to Neighbourhood Planning.

As addressed in my email of the 29th September 2017 I outlined what Breckland Council was responsible for, which still applies: *"As required by the relevant regulations, Breckland Council are responsible to agreeing the Neighbourhood Plan area (which may be subject to consultations, as was the case with this neighbourhood plan), and once the plan has been submitted are responsible for organising and making decisions on the remaining statutory stages, including assessing whether the Parish has met the regulatory requirements (N.B. This stage has not yet been reached). The exception to this is the appointing the independent examiner, which is done jointly".* Currently we do not have any concerns about the Parish Council, or Working Group, not meeting any of the regulatory requirements.

Any concerns you have about the consultation element of the Neighbourhood Plans production, can be addressed by making comments on the Consultation Statement (which you were advised about in my email of the 28th November 2017), which is one of the documents that is issued for consultation at the same time as the Submission version (Reg.16) of the Neighbourhood Plan (neither of which have yet been issued). Also advised in that email, was

that the approaches being taken, *“by focusing consultation at a different audience at different times, is one of a number of methods that is taken by such groups”*.

Any concerns you have about the Neighbourhood Plan itself, needs to be addressed by making comments during the public consultation stages. You have already made comments in relation to the Pre-submission version (Reg.14) of the Plan; you will also have a further opportunity to make comments on the next Submission version of the Plan.

Once received all the comments will be sent to the Independent Examiner to consider, along with other documents and any comments made on them, as part of the Examination stage. It will be at this stage that that a view is taken by the Independent Examiner about the Plan.

Susan

From: Stimpson Survey <info@stimpsonsurvey.co.uk>
Sent: 28 February 2020 10:28
To: Heinrich, Susan <Susan.Heinrich@breckland.gov.uk>; Wood, Simon <Simon.Wood@breckland.gov.uk>; 'Trevor Wenman' <parishclerk@newbuckenhham.net>
Subject: New Buckenham Proposed Plan

Susan

Many thanks, the letter was circulated to you internally within Breckland. You may not have seen the related material & correspondence.

I note you mention a further opportunity to review the 'next submission version' of the Proposed Plan in due course. Thus far the project is a Proposal, subject to numerous hurdles, and by no means a certainty. Thank you for confirming that 'all comments will be submitted to the independent examiner to consider'. Your comment "along with other documents and **any comments made on them**" presumably also refers to documents that have been noted as absent.

The Parish Council have acknowledged a formal complaint, not confined to the intentional exclusion of the owners of 90% of the Plan area, from the 'survey'.

Charles Stimpson
Ph. 01732 838418. Mb. 07919 592106

From: Heinrich, Susan [<mailto:Susan.Heinrich@breckland.gov.uk>]
Sent: 28 February 2020 10:47
To: info@stimpsonsurvey.co.uk
Cc: parishclerk@newbuckenhham.net; info@np4nb.online; Darcy, Andrew; Wood, Simon
Subject: FW: New Buckenham Proposed Plan

Charles,

I am not aware that there are any documents, that are required by the regulations, that have not been submitted at the correct stage; the examiner is only required to look at these documents.
Susan

From: Heinrich, Susan [mailto:Susan.Heinrich@breckland.gov.uk]
Sent: 28 February 2020 11:13
To: Stimpson Survey
Cc: parishclerk@newbuckenhams.net; info@np4nb.online; Darcy, Andrew; Wood, Simon
Subject: RE: New Buckenham Proposed Plan

Charles,

This is not a required document and consultants do not normally produce separate reports; their work is either to produce or assist with the production of the required documents.
Susan

Stimpson Survey <info@stimpsonsurvey.co.uk>
To: 'Heinrich, Susan'
Cc: parishclerk@newbuckenhams.net, info@np4nb.online, 'Darcy, Andrew', 'Wood, Simon'
Fri, 28 Feb 2020 at 12:22

Susan

I think it will be preferable to let the Parish Council deal with the complaint that has been raised, you have not seen all the papers referred to nor were you at the relevant meeting, nor, so far as I know are you appointed to deal with the complaint and you are not a Parish Councillor at New Buckenham.

The report I have referred to as missing, was funded, a meeting was told it was merely delayed by ill health, but ultimately it was not in fact produced. It is a key report in what is fundamentally a proposal about planning and building for the village, especially as there are no professionals in that field on the Parish Council who have published the draft.

I feel sure it would be better to let the Parish Council respond in due course.

Regards
Charles Stimpson Ph. 01732 838418. Mb. 07919 592106

End of complaints correspondence