

New Buckenham Neighbourhood Plan

Submission Plan for Regulation 16 Consultation

Ref	Received	Organisation	Page and Policy / Paragraph No	Comment	Suggested Amendments
01/01	16/07/2021	Sport England	N/A	<i>No comments on the plan – only advice on documents to look at when preparing a plan.</i>	
02/01	20/07/2021	Highways England (now National Highways)	N/A	We have reviewed the plan and content that the draft policies set out are unlikely to have an impact on the operation of the A11 trunk road. Consequently, we offer No Comment .	
03/01	30/07/2021	Historic England	N/A	We welcome the production of this neighbourhood plan, but do not currently have capacity to provide detailed comments.	
04/01	08/08/2021	Andrew Bingham	1.3.3	The NP incorrectly states that the NP cannot ‘undo’ strategic policies from the Local Plan. I consider that this is incorrect and has been used as justification for not identifying sites for new housing. The NP is able to increase (albeit from a zero base) numbers of housing proposed in the LP – it cannot decrease numbers.	This is a fundamental flaw in the plan which needs to be revised to specifically meet recognised demand for affordable housing
04/02			1.5.1 – 1.5.4	The evidence of over 50 businesses and other criteria in the village clearly demonstrate that this is a flourishing compact village that does not justify the designation of a settlement without a boundary.	Section 1.5 is inconsistent and paragraphs conflict and need to be re-written to counter Breckland’s incorrect designation.
04/03			1.6.4	This section ignores the presence of a still valid Housing Needs survey which recommended provision of 5 affordable homes. The comments in this section on preference for more housing are leading questions and do not replace the HN survey. It is interesting to note that over the last circa 30 years some 70 new homes have been built in the village, but the current plan seems to aim to prevent any new homes.	The basis of the NP needs to be re-written to properly incorporate the demands for affordable housing, the HN survey should be properly updated to reference current affordable homes demands.

04/04			Policy LH1 – 2.2.14	This policy calls for new buildings to have a positive impact on the local heritage. This is a highly subjective approach – what does it mean and how can the Parish Council make any rational judgment on the degree and extent on the local heritage and landscape. Can this impact be of a minor nature, or significant impact.	
04/05			Policy LH 4 – 2.2.18	As above this requires a subjective judgement without any guidance on the scale of the impact – is this an absolute term whereby if it is to maintain the setting then does this preclude any development.	The wording is unclear and needs to be re-written – however the contract is important as the wording must not be used to preclude development.
04/06			2.3.6	I disagree that New Buckenham is a relatively isolated rural setting. There is a busy road through the village and the village is close to other settlements. The rural setting is dominated by industrial agricultural fields other than to the east is the common, but again with housing and a business close to or on the common.	
04/07			2.5.5 – 2.5.7	I disagree with the statement that there is no requirement for the community to identify land for development. – the NP misses the opportunity to identify sites for affordable homes. The wording in 2.5.6 is contradictory and tries to equate the leading questions in Survey17 with the results from the more balanced HN survey. 2.5.7 appears to attempt to discredit the HN survey by implying that needs change so there is no reason to take much notice of the HN survey.	Update the HN survey and identify opportunities for sites for affordable homes.
04/08			2.5.13	This Clause seems to imply an affordable homes policy by telling persons in d=need of affordable homes to leave the village. I consider this is a wholly unacceptable approach and cannot be a policy for New Buckenham – it implies an exclusive environment were only wealthy home owners can live.	Re-write

04/09			2.5.14	This statement aims to prevent housing instead of finding positive ways to meet the affordable housing demands. The statement of 'no harm' can be interpreted to be impossible to meet hence entirely preventing housing – the statement should give guidance of an acceptable level of harm.	Re-write
04/10			2.5.23	This gives an example of the negative approach in the village to any form of development, and conflicts with the criteria of improved communications. If the phone mast (sensitively designed) had been constructed, we would now have a mobile phone signal. Objections were largely based on the view from the castle some 400m distant from the proposed mast site. The view from the castle is in fact dominated by the 11KV High voltage overhead cable passing through the castle grounds.	
04/11			2.6.12	Note that the Village Hall has not been consulted on the use of the hall for car parking. The VH car park is therefore the use of hall users and not for community parking. However the village hall will be considering installation of EV charging in the future.	
04/01				<p>The Plan has no policy about preventing development. It acknowledges that development is likely to happen and indeed proposals “...are welcomed in the Plan’s Area if they can be demonstrated...” in para 5.1. The Plan is context-based rather than an identification of development sites, a point that has been discussed in the Parish Council workshops.</p> <p>In the Reg 14 consultation, Historic England states: “...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...” We would be happy to use ‘contribution’ rather than ‘impact’ if the Examiner deems necessary.</p>	
05/01	17/08/2021	Natural England	N/A	Natural England does not have any specific comments on this draft neighbourhood plan.	

06/01	17/08/2021	Mary Dowson	p8 [??], 1.4	While investigating the NP it became apparent that one of the key factors contributing to social cohesion in this community is geography. The village retains its ancient grid road system, its housing is concentrated within ancient boundaries and as villagers walk around the village (rather than drive) nearly everyone is known and involved to some degree in community life.	
06/02			1.7.1, Aim B	Especially important to provide activities for younger members of the village and engender enthusiasm not only to take part but take a role in their administration.	
06/03			p37, 2.4, Dark Skies	Agree with Dark Skies Policy but must ensure that functions must be well lit to enable disabled and children to partake safely e.g. Village Hall.	There is a breadth of opinion on this subject but there is a growing need to respond to an environmentally friendly agenda that emphasises that lighting should only be used where and when it is needed.
06/04			p57, 2.6 ,Traffic and Parking	Traffic is a concern to all village people: large lorries moving through the narrow streets damage property, frequently cause a blockage in the Main Street and are a significant hazard to pedestrians.	
06/05			p57, 2.8, Recreation, Health Culture	This happy community- much admired by others in Norfolk- is drawn together by its love of village history, rural location and vigorous village life. The Players is a important component of village social life, draws young and old together, and provides entertainment to NB and many others from nearby villages.	

07/01	03/09/2021	Old Buckenham Parish Council	N/A	Old Buckenham Parish Council would like to commend New Buckenham on their excellent Neighbourhood Plan. OBPC felt it read very well and was very detailed and comprehensive, and will be looking at it as an example of what can be achieved.	Thank you for these kind remarks.
08/01	03/09/2021	Geoff Gilder	Page 41, Para 2.5.13	We consider that the suggestion in this paragraph, does not address the needs of older long-standing residents who wish to remain in the village but whose housing is no longer suitable/affordable. As village residents of over thirty years we have numerous examples of individuals wanting to downsize to smaller properties within the village.	To explore further the possibility of identifying a Rural Exemption site as outlined in para 2.5.11
08/02			Pages 46/47/48	We acknowledge all the issues identified in these pages in relation to traffic and parking. It is recognised that the most effective way of slowing the traffic through the village is to retain parking along the main thoroughfares.	In terms of community action the plan should be suggesting ways of reducing dependency on cars by considering, for example, carsharing schemes and the lobbying of the bus companies to increase the provision of public transport serving the village.
08/03			Page 49 Para 2.6.21	We do not support enlarging the car park near the play area. This would lead to a loss of green space which the village is trying to maintain and is likely to result in more cars driving through the village, with increased noise, littering, and safety issues around the car park and play area. We feel this suggestion contradicts several of the key aims of the neighbourhood plan as outlined on page 11.	AS ABOVE

09/01	05/09/2021	Mary Manning	2.3, Countryside and Environment	<p>A general comment: the residents of New Buckenham greatly value the rural setting of this village and in the last 2 years several initiatives have been set up by local groups (families & children) to improve the 'green infrastructure'. Trees have been planted, areas around the village have been designated for re-wilding, and young people encouraged to find ways in which they can respond to climate change and make a difference. There is so much more we can, and will, do. It is important therefore that we continue to safeguard our green spaces.</p>	
09/02			2.6, Traffic and parking, 2.6.2	<p>The B1113 that cuts through the centre of the village brings ever increasing numbers of large lorries into the tight and narrow main street and village residents are often called upon to assist by directing traffic and helping to avoid a blockage. In some areas of the village there is barely enough space for pedestrians to walk safely along the pavement.</p> <p>The Neighbourhood Plan has identified traffic and parking as the most contentious issues for residents and visitors and for this reason there must be further discussion with the County Council.</p>	
09/03			2.8, Recreation, health and culture	<p>The Plan describes in detail the community assets and amenities of this village but none of us could foresee how the village would cope with the pandemic and lockdown. The periods of lockdown highlighted the strengths and benefits of living in this small close-knit community and, perhaps more importantly, how much visitors to the village enjoyed the space and recreational benefits of our splendid countryside. I hope this will be taken account of when the Plan is reviewed.</p>	

10/01	06/09/2021	Norfolk County Council	General Comments	The Natural Environment Team supports the objectives and policies in the New Buckenham Neighbourhood Plan from an ecological and landscape perspective. From both an ecological and a landscape perspective the policies are in-line with the NPPF and Breckland's adopted local plan. There are opportunities to provide greater protection and enhancement of the natural environment in the Neighbourhood Plan.	As explained in the Examiner's clarification note, NCC's Reg 14 comments were overlooked. However its Reg 16 comments are more comprehensive and we have responded accordingly.
10/02			Page 25-26, Paragraph 2.3.6	The name of the SSSI could be included for clarity. The SSSI is also bordered by Land adj. New Buckenham Common County Wildlife Site (CWS) and Adj. New Buckenham Common (CWS).	The name of the common/ SSSI being referred to could be provided for clarity eg. "New Buckenham Common SSSI has comparatively few records." Agreed with using the full name in the first instance, while pointing out that only the part north of the B1113 road has SSSI designation.
10/03			Page 26, Footnote 32	Amendment is required to, footnote 32, to reflect the current legislation.	This footnote should be amended to Wildlife and Countryside Act 1981 (as amended). Agreed.
10/04			Page 34, Policy CE 1, Paragraph 2.3.31	It may be beneficial to consider encouraging native planting within the submitted planning applications.	Native planting could be encouraged in Policy CE 1. Agreed. Reference to native species is made elsewhere in the Plan.
10/05			Page 34, Policy CE 1	The Preliminary Ecological Appraisal (The Ecology Consultancy; November 2018) produced for New Buckenham Neighbourhood Plan provides advice on ecological issues and enhancement measures.	The ecological issues and enhancement measures from the Preliminary Ecological Appraisal could be incorporated more into the plan, for example there is no mention of
					protected/ notable species within the policies. We see such detail as being provided by the PEA and don't feel that they should be specifically mentioned in policies.

10/06			Page 34, Policy CE 1 Paragraph 2.3.31	<p>There is a discrepancy between the wording of Policy CE 1 as written in page 34 and 63. Policy CE 1 (para 2.3.31) states that ‘protect wildlife habitats and networks in areas without areas without specific designation’, however, the final sentence ‘in areas without areas without specific designation’ wording has been removed from Policy CE 1 on page 63. This removal is supported, as this wording would limit protection and enhancement to areas without specific designation.</p>	<p>Policy CE 1 (page 34) should be amended to reflect the text as written in Policy CE 1 (page 63), to remove the wording ‘<i>in areas without specific designation</i>’.</p> <p>Policy CE1 on page 24 and 63 should read “...networks in areas with or without specific designation”.</p>
10/07			Policy CE 2 - 2.3.33	<p>Clarity may be beneficial to differentiate between areas of ecological/conservation benefit, and public open space.</p> <p>Whilst both elements of Green Infrastructure, these often do not work in conjunction unless sufficiently planned. Where a development results in the loss or deterioration of habitat – the developer could argue that this has been replaced with public open space – resulting in public benefit, which would then comply with this policy. But overall, there would still be a loss of important habitat.</p>	<p>Differentiating between areas of ecological/conservation benefit and public open space.</p>
10/08			Figure 22	<p>Figure 22 displays ‘green corridors’ around the village where, although not formally designated, interruption of continuity should be avoided. This could potentially be expanded to the wider neighbourhood area. It is noted that some potential green corridors, for example hedgerows identified within the Preliminary Ecological Appraisal Report (The Ecology Consultancy; November 2018) are not shown on this plan.</p>	<p>Mapping of the green corridors could be expanded to the whole neighbourhood area.</p> <p>The important corridors radiating from the centre are indicated. A map showing all the ‘green’ corridors might obscure this.</p>

10/09			Policy CE 4	It is not clear if the owners of the ponds have agreed its allocation as a Local Green Space. Whilst we would support the restoration of the pond for wildlife we recommend this is undertaken with guidance from a suitably qualified ecologist to avoid potential impacts on protected and notable species that may be using the pond.	None. We will ensure that the official notification has been sent to the owner. We are pleased that pond clearance has already been done in conjunction with the owner, Norfolk Wildlife Trust, under the guidance of its Brecks Reserves Officer.
10/10			Section 2.4, Dark skies and light pollution	Sensitive lighting scheme designs for development would mitigate potential adverse impacts on nocturnal wildlife. Lighting should be directed away from green corridors and habitats used by nocturnal wildlife. Lighting design for biodiversity: https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/	None.
10/11				There are very few references to flooding as a whole within the Neighbourhood Plan, with minimal specific references to surface water flooding, drainage and sustainable drainage (SuDS) implementation. The Lead Local Flood Authority (LLFA) recommend that a full review of flooding within the Parish of New Buckenham is undertaken to assess flood risk in the area.	The LLFA advises that reference is to made to the Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document within the Neighbourhood Plan. The LLFA recommend the inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at: <ul style="list-style-type: none"> ▪ GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map ▪ Norfolk County Council (NCC) – Flood and Water Management Policies

					<ul style="list-style-type: none"> ▪ Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document
10/12				<p>According to LLFA datasets (extending from 2011 to present day) there is 1 record of external flooding in the Parish of New Buckenham (dated 2018). The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports here.</p> <p>According to Environment Agency datasets, there are areas of surface water ponding and surface water flowpaths present within the Parish of New Buckenham. We note that no surface water maps are included within the submitted Neighbourhood Plan.</p>	<p>The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at:</p> <ul style="list-style-type: none"> ▪ GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map ▪ Norfolk County Council (NCC) – Flood and Water Management Policies ▪ Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document

10/13				<p>It is noted that there is no specific section/policy within the Neighbourhood Plan to address flood risk as a whole or flood risk and drainage/water management in regards to development. We strongly advise that the LLFA policy wording is included in regards to surface water flood risk.</p>	<p>The LLFA would recommend the following to be included with regards to surface water flood risk:</p> <p>The Neighbourhood Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.</p> <p>Any new development or significant alteration to an existing building within the Parish of New Buckenham should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:</p>
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					<ul style="list-style-type: none"> • Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources. • Have a neutral or positive impact on surface water drainage. • Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as: <ul style="list-style-type: none"> ▪ Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk). ▪ Where appropriate undertake sequential and /or exception tests. ▪ Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use. ▪ Inclusion of appropriate allowances for climate change. ▪ Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location. ▪ Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.
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					<ul style="list-style-type: none"> ▪ To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary. ▪ Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms. <p>NCC's detailed recommendations about flooding are noted. New Buckenham is not officially at risk from sea or river flooding, but we know that the village has been affected by surface water run-off coming from farmland north of the village. The Plan's local design guide refers to sustainable drainage in para 6.2(h).</p>
11/01	08/09/2021	Charles Stimpson		<i>See Letter with comments</i>	
12/01	09/09/2021	Avison Young (UK) on behalf of National Grid		National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	<i>Current error in link provided – send email to ask for correct link.</i>
13/01		Breckland Council		<i>See Delegated Authority Blue Form and 3 Appendixes</i>	