

New Buckenham Neighbourhood Plan

Draft Plan for Submission (Regulation 16) Consultation

While this continues to remain a very well-presented plan, there have been a significant number of changes to the contents, which has resulted in the presentation of the Plan not having the same impact as the previous Pre-submission (Reg.14) version. Also due to the number of changes to the Plan, some of these have not been constructive, hence the need to make a large number of further comments to improve the supporting text and policy wording. In addition to this, some of the new policy also lack any evidence to justify the policies.

KEY: NP - Neighbourhood Plan / LP - Local Plan

Page and Policy/ Paragraph No	Comment	Justification	Suggested Amendments
GENERAL COMMENTS			
Formatting	The headings fonts are more basic than the Reg.14 version of the Plan, and it does not present as well as the former version. Also there is an inconsistent approach in the policy area headings. On p19, the policy letters are included in the heading ' <i>Landscape and heritage (LH) issues</i> '; on p34, they are included in the heading ' <i>Countryside and environment (CE) policies</i> '; and the same for the Housing and building policies on p44, but they are not included in anywhere in the other five policy area headings.	Presentation	Revert to previous heading format or make the main policy subject headings stand out more prominently e.g. put in bold While this is useful to include the policy letters, they should appear in the same heading, such as the policy one. Do formatting once text finalised. Agree with second paragraph.
Spacing	The Plan is 20 pages longer than the previous version. Some of this is due to the greater underuse of existing space, e.g. p14, previously section ' <i>2.2. Landscape and heritage</i> ', followed ' <i>2. New Buckenham Neighbourhood Plan policies</i> ', where now there is half an empty page.	Presentation	Remove all spare space. Do formatting once text finalised.
Policy referencing	The purpose of including the Aims in the title of the policies is not clear, as this has no impact on making decisions on planning applications.	Clarity	If this is still required, only retain them in the list of the policies in the rear of the Plan for information purposes. Do not agree: this was a specific suggestion, made in the Reg 14 consultation, to

			link the Aims with the Policies. This makes it clear for the lay reader.
Reference to NPPF	All references to the 2019 NPPF will need amending as there has been a more recent update.	Clarity	Amend any reference to '2019' to 'July 2021' and ensure all para references are still correct. Agreed.
Community Actions	While we generally tend not to make comments on these as they are work that the Parish would like to focus on, it is important to acknowledge that a number of them will have a benefit for district planning generally, but specifically the production of any future Local Plan.	N/A	N/A
SPECIFIC COMMENTS			
Front cover	As previously advised, the wording 'in association' needs re phrasing as the Neighbourhood Plan is produced by or on behalf of the Parish Council, not Breckland Council.	Accuracy	"With the support of" would be more appropriate. Agreed.
p3,	This new page does not work well in its current location. It would benefit from being swapping with the Forward page.	Presentation	Swap with Forward page. Do formatting once text finalised. This can be done if appropriate.
p4,	Formatting - To be consistent with the rest of the Plan the heading should be in bold.	Presentation	'FORWARD' Agreed.
p4, 5 th & 6 th para	As previously advised, the wording misses an opportunity to clarify the main other documents that must be submitted along with the Neighbourhood Plan.	Accuracy	5 th para - "This Evidence Base includes all the comments submitted and the responses given during the consultation (The Consultation Statement), and the Plan has been revised ..." 6 th para - "... together with all its supporting evidence and a statement (The Basic Conditions Statement) showing that it meets the criteria set by the Regulations. Agreed.
1. CONTEXT			
p8, para 1.3.1	This could be improved by making it clearer that the 'development plan' is the starting point for any planning application.	Clarity	"When decisions are made on planning applications, the policies in the development plan ', including a 'made' Neighbourhood Plan must be ...". Agreed.

p8, para 1.3.2	Formatting - 1 st sentence - There is a space missing between 'NPPF' and 'and'.	Typo	"... the National Planning Policy Framework (NPPF) and other relevant legislation". Agreed.
p8, para 1.3.3	2 nd sentence - there are 2 'however' s'.	Typo	Remove one 'however'. Remove second 'however'. Also add full stop at end of second sentence.
p8, para 1.3.4	1 st sentence - The text needs some further minor amending, to make clear that these are not the only regulations the Plan needs to conform to. 3 rd sentence - The text needs some further minor amending, to make it clearer what is being referred to.	Accuracy Clarity	" Some of t Some of t The regulations that the Plan needs to meet ...". Agreed. "The Independent Examiner will ensure that it the Plan conforms to ..." Agreed.
p9/10, para 1.6	We welcome the development of the text in this section.	N/A	N/A
p10, para 1.6.4	2 nd sentence - Reference to 'reflect local styles'. (Also applies to p39, para 2.56).	Query	'Local Style' should be clarified by referring to the character appraisal for local style. Agreed.
p10, para 1.6.5, photographs	Formatting - While we welcome the inclusion of headings for the photographs, they would present better if located under each relevant photograph.	Clarity	As advised. This was for space saving reasons. Can be done after text finalised.
p13, para 1.10	We welcome the development of the text in this section.	N/A	N/A
2. NEW BUCKENHAM NEIGHBOURHOOD PLAN POLICIES			
p14, para 2.1.1	Some of the text has been deleted, which was useful for clarifying the layout of the chapter and should be reintroduced.	Clarity	"This section of the Plan deals with separate topics, each one describing the relevant facts and issues concluding with the proposed policies" . Agreed.
p14, para 2.1.2	While we have no issue with the new commitment to review the Neighbourhood Plan, there is no regulatory requirement for how often this should be (unlike Local Plans). Therefore to maintain some flexibility, we suggest that either the frequency for this is removed, or a review is <u>considered</u> every five years, as there is no long-term guarantee for the any resources to implement this.	Flexibility	"The Parish Council will formally review the implementation of this Plan and review its policies on a regular basis at least every five years (see Section 4)". OR "... and consider reviewing its policies at least every five years (see Section 4)". This latter amendment preferred.
2.2 LANDSCAPE AND HERTIAGE POLICIES			

p15, Figure 6 Aerial view of earthworks from west and remains of mediaeval castle keep from south	In the previous pre-submission version of the Neighbourhood Plan, the photographs of the earthworks and remains of mediaeval castle were on the same page as the ' <i>Listed buildings in New Buckenham</i> ' Figure. These photographs helped explain the map, which now no longer occurs as they are not on the same page.	Clarity	If as advised above, under the general comments section, the spare space was used on p16 e.g. the text on ' <i>2.2. Landscape and heritage</i> ' directly followed the ' <i>2. New Buckenham Neighbourhood Plan policies</i> ', the photographs and text can be on the same page again. Can be done after text finalised.
p16, Figure 7 Listed buildings in New Buckenham	We welcome the change in colours used, so it is much clearer where the different Grade II buildings are.	N/A	N/A
p19, Figure 11 Line of Town Ditch	As previously advised, it would be useful to explain about the numbers on the Map. Also there is no clarification about what HER stands for on the map?	Clarity	As advised. Already in the italic line under the map. The legend has missed out the 'N' in NHER. Done, see below, can be substituted.
p20, Figure 12 Building construction dates since 1883	We welcome the changes made on the map, as advised previously.	N/A	N/A
p20. para 2.2.10	2 nd sentence – there is a need to refer to ' <i>pre-application discussions</i> ' as this is the best time for any changes to proposals to be made.	Clarity	"This can be aided by The Parish Council would welcome active <i>pre application discussions with prospective developers</i> taking an early, active involvement in planning proposals". Agreed.
p21, para 2.2.12	1 st sentence - some clarification is required as to whether <i>the 'defined boundary'</i> is the same as the ' <i>village boundary</i> ' referenced at the end of the same paragraph or whether it is the moated area or the conservation boundary including the castle.	Clarity	Amend to clarify which ' <i>uniquely defined boundary</i> ' is being referred to. Would be better to state: '...illustrate its defined boundary set in the local landscape, an almost unique characteristic of the village'.

p23, POLICY LH 1 Change of use and extensions to historic buildings	As previously asked, 'What is 'sufficient information'?' 2.2.14	Clarity	This needs to be more precise e.g. is it specific information in a Design and Access Statement or Conservation Statement that is required & what should it contain? This should be outlined in the evidence. The intent is to say 'sufficient detail to demonstrate a positive impact' in the wording of a development proposal.
p21, Figure 13 Important village views to be protected	In the previous pre-submission version of the Neighbourhood Plan, the photographs of the views were on the same page as the ' <i>Important village views to be protected</i> ' Figure. These photographs helped explain the map, which no longer occurs as they are no longer on the same page. Also this has resulted in duplicate text on pages 21 & 22 regarding the views, which would not be necessary if they were on the same page. Also the information in the Legend needs lining up together.	Clarity Presentation	If as advised above, under the general comments section, spare space was used e.g. the changes suggested regarding p15, Figure 6, there would be enough space to achieve this, even if the photographs needed to be reduced to the size in the Reg.14 version. Agreed but can be done after text finalised. As advised.

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	Also previously advised, other wording still needs to be developed to be more technically accurate.	Terminology	<i>"... that seek to retain and revitalise historic buildings...ensure the appropriate ongoing preservation of heritage assets either through conservation, renovation, remodelling, extension or adaptive reuse, ...will be supported..."</i> Agreed.
p23, POLICY LH 2 New buildings	It is not clear why the previous 2 nd & 3 rd sentences have been removed in light of the amendments we suggested.	Clarity	<i>Reinstate and amend as previously advised e.g. "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" Agreed.</i>

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p23, Policy LH3 2.2.16	1 st sentence - an awareness does not necessarily mean that there will be a positive outcome. The policy wording could be tightened.	Clarity.	<i>"All development proposals should demonstrate an awareness of and respect for the historic boundaries of the village, including the line of the town ditch. Agreed.</i>
p23, POLICY LH 4 New development and open countryside setting	2 nd sentence - As previously advised, 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 2.2.12. The open space surrounding the Castle and the open space surrounding the village, as demonstrated by the views, should not be compromised. How can this be expressed?

2.3 Countryside and environment

Page 26 2.3.10	"There has been no district wide green infrastructure study..." As Breckland Council was part of a county wide study, this needs re-wording.	Accuracy	"There has been no district wide green infrastructure study but Breckland Council contributed to a Norfolk wide Green Infrastructure Strategy which included a Green Infrastructure map. In its Local Plan Breckland ..." Agreed.
p27, para 2.3.16	As previously advised, it's not necessary to repeat what is already in the Local Plan as repeating the existing Local Plan Open Spaces could make the Neighbourhood Plan outdated when the Local Plan is reviewed. Also a NP can't 'confirm' an adopted strategic LP policy (Policy ENV 04 Open Space, Sport	<i>"... avoiding unnecessary duplication of policies that apply to a particular area"</i>	"2.3.16. This Plan confirms the Open Spaces designated within the Local Plan policies Map for New Buckenham⁴³ shown in Figure15. ..." Agreed.

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	& Recreation); it should simply conform what the policy is unless it is proposing changes and therefore this needs clarifying.	Para 16 f)), NPPF (2021)	
p27, Figure 15	Note below the table: While this clarification is useful, the difference between 'New Buckenham' and 'its Neighbourhood Plan Area' is not clear as the former (the village) lies within the latter and therefore this needs amending. The footnote regarding No ⁴³ is incorrect.	Clarity	"... in the schedule is neither in New Buckenham nor its-not in the Neighbourhood Plan Area so is omitted here". Agreed. Replace 'p194' with 'p184'. Agreed.

p28, Figure 16	<p>The map does not make it clear which open space site is which. It would be useful if the map and Figure 15 were either on the same page or spread of pages.</p> <p>Also Site NB8 seems to be missing from the map. Also it includes land around the Kings Head pub (land south of B1113), which is not in the <i>'Breckland Open Space Parish Schedule (2015) Part 2, p184/5 (Table 69.1 & 2 & Figure 69.1)'</i> nor Breckland Local Plan policies map, neither of which is made clear in the plan.</p>	Clarity	<p>Add the Breckland reference to the relevant site on the map. Done, see below. Move Figure 16 (Map of Open Spaces ...) on the same page as or opposite Figure 15 (List of Open Spaces). Do after text finalised. NB8 will be added to the map. The land in the village south of the B1113 to which you refer is part of the Market Place, ref. NB2. The revised map should make this clear. Done.</p>
p29, Figure 17 Proposed Local Green Space designation	<p>Under the <i>'Site'</i> heading - The <i>'Figures'</i> references need correcting. <i>'Qualifying criteria'</i> heading - the format does not provide an adequate assessment of the local green space criteria which has been requested by previous examiners.</p>	Typo & Clarity	<p><i>'See Figures 20,21 18 & 22'.</i> For examples of the type of assessment required see p57, para 4.62 of the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (2018) or p99, Appendix H of the Swaffham Neighbourhood Plan. The 'Pond and surroundings by the cricket pitch' qualifying criteria could be expanded to: 'richness of wildlife, close to built boundary of village, and adjacent to walks and recreational area. Its visual amenity has potential for improvement with light-touch management.'</p>
p29, para 2.3.17	<p>3rd sentence - this needs to be phrased better as it appears to be making a suggestion for a <i>'Local Green Space'</i> without naming the site. Also the use of "It's". Contractions are not used in formal documents</p>	Clarity & Grammar.	<p><i>"The pond and surrounding area is a A small areas that is worthy of designation under this category even though it's it is in the ..."</i> Agreed.</p>
p29, Figure 18	The title needs to be amended, so it is clear that this is a Local Green Space destination.	Clarity	Figure 18 Local Green Space designation - Pond and surroundings by cricket pitch Agreed.

	Also the map is too small and needs to show where the cricket ground is in relation to the proposed Local Green Space.		Improve map as advised. This was space saving and can be corrected when the text is finalised including later figures about Track past Tanning Lane after para 2.3.23.
p30, New Buckenham Common Site of Special Scientific Interest	The paragraph number is missing. It would also have been useful to have a map showing where this site is.	Typo Clarity	Replace the 'g' with '2.3.19'. Also all subsequent paragraphs, including policies, will need amending until page 35. As advised. Agreed, do after text finalised.
p31, para 2.3.21	3 rd sentence - is the figure being referred to the correct one? 3 rd sentence - as previously advised, it is not clear why there is a reference to Green corridors (& a map showing them), but no policy on them. They either need to be referred to in a policy or at least have the supporting text amended.	Typo Clarity	Replace the 'Figure 24' with 'Figure 22'. It's still Figure 24 until Figures 17,18,19 are removed. "...interruption of continuity should be avoided would be better avoided ". Agreed. Also make reference to them in policy CE4 – see comments. The LGS designation is formal but that can't be applied to green corridors. Should it be a separate policy? e.g. 'Wildlife or green corridors should not normally be interrupted and opportunities for their enhancement should be supported.'
p31, para 2.3.23	It is not clear why this has been included (along with the map below) when there is no cross reference to policy LH 4 on 'notable views' (para 2.2.18).	Clarity	Make a cross reference to policy LH 4. Agreed.
p32, Figure 24 Direction of view down track past Tanning Lane	This map needs to be enlarged to be able to be used effectively. Also it needs to be renumbered as there is already a Figure 24 and no Figure 23.	Clarity	As advised. Can be done when text finalised. This will change subsequent figure numbering.
p34. para 2.3.30	1 st sentence - This is not in accordance with the new Environment Bill.	Clarity	Replace "should not be supported" with "will not be supported" as per Environment Bill. Agreed.
p34, Countryside and environment issues	As the heading 'Local opinion' has not been used in any other policy areas when making reference to SURVEY17, is this really needed here?	Consistency	Remove this sub-heading. Agreed.

			<i>All new developments and major alterations of existing properties should demonstrate that building work will at least maintain and, if possible, enhance biodiversity and protect wildlife habitats and networks in areas without specific designation. We think this part should be two rows below where it appears again.</i>
p34, POLICY CE 1 Developments and natural environment	2.3.31, 1 st sentence - Not all developments will require all of these elements to be demonstrated. Also "... protect wildlife habitats and networks in areas without specific designation". This approach is not consistent with national guidance. 2 nd sentence - as previously advised, where is the evidence that justifies the need for a 'green space & landscaping strategy'?	"Plans should: distinguish between the hierarchy of international, national and locally designated sites;..." 175, NPPF	"Where appropriate, All new developments and major alterations of existing properties... ...protect wildlife habitats and networks in areas without specific designation. " Agreed. Also provide evidence for the 2 nd sentence. The intent is to ask for a green context to any design and access statement proportionate to the development.
Page 34 CE1	<i>All new developments and major alterations of</i>		Re-word beginning of Policy as follows: <i>All new developments and major alterations of existing properties should demonstrate that building work will at least maintain and, if possible, enhance biodiversity and protect wildlife habitats and networks in areas without specific designation. Agreed.</i>
p35, Policy CE 2: Loss and restitution of important habitats	2.3.33, 1 st sentence - As previously advised, the approach taken regarding the features listed will depend on the status the habitats listed will have nationally. Where is the evidence for the approach in the policy e.g. what is an 'important habitat' and designations do these features come under?	Evidence	Either provide the evidence or clarify the mitigation required for the different types of habitats if national guidance can't justify a refusal. The Plan refers to the Government's "Biodiversity 2020 strategy" which requires planning and development authorities to protect wildlife and the environment. No more mapping of species has been done other than that in the Preliminary Environmental Assessment published as a supporting document. Local species of

			interest are covered in para 2.3.7 of the Plan. A footnote could be added to the policy if thought needed.
p35, Policy CE 3: Green living plan requirement	Policies should be appropriate to the scale of development proposed. As the NP proposes very small-scale development of single dwellings/affordable housing, it may not be appropriate for all developments to have regard to Local Design Guide B.	Viability	Add at the end of the 1 st sentence add “ as appropriate ”. Agreed.
p35, Policy CE 4: Designation of local green spaces	Regarding comments in 2.3.21, amend the title to make reference to ‘ <i>Open Spaces</i> ’ and ad a new paragraph confirming these areas. It would be useful to also cross refer to Figure 18 showing where this site is.	Clarity	“ <i>Designation of local green and open spaces</i> ” Add a new paragraph: “ <i>The following sites have been allocated as an Open Space:</i> •... (<i>List the Green corridors to be designated, which are not already designated as an Open Space</i>) As advised. This was only intended to be guidance rather than formal designation. Is there a mechanism to designate formally? Are the key ones essential to map and list?
p35, Community Action:	CA CE 1 - As previously advised, this should clarify that this is referring to ‘ <i>non-designated</i> ’ green & blue and corridors e.g.	Clarity	As advised. Agreed.
Countryside and Environment	those that have no formal designation but have a local significance.		
2.4 Dark skies and light pollution			
p37	While it is welcomed that more evidence has been provided for restricting outdoor light, there is no recognition of the need for lighting for residential property or for personal safety reasons or sight disability and how this can be addressed.	Clarity	As advised Suggest insert after first sentence of para 2.4.2: ‘Although it is reasonable to use outside lighting for personal safety and reasonable adjustments for disability, it should only be used where and when it is needed especially when public space is involved.’
p38 Policy DS1 & DS2	2.4.6. The Plan refers to lighting issues from residential lights and LED streetlights. There may be a need for lighting for other reasons. Replace DS 1 and DS 2with new Policy to clarify the issue.	Clarity.	“ Development proposals must demonstrate that all opportunities to reduce light pollution have been taken, and ensure that the measured and observed sky quality in the surrounding area is not

			negatively affected, having due regard to the following hierarchy: a. The installation of lighting is avoided; and b. If lighting cannot be avoided, it is demonstrated to be necessary and appropriate, for its intended purpose or use: i. Any adverse impacts are avoided; or If that is not achievable, then adverse impacts are mitigated to the greatest reasonable extent including restricting the hours of use". Agreed, may need better layout.
p38, Community actions: Dark skies	A more balance approach may need to be taken with regards the implications of this approach concerning sight disability and the 2010 Equalities Act regarding ' <i>reasonable adjustments</i> '.	Legislation	As advised Agreed, as two rows above.
2.5 Housing and building			
p39, para 2.5.4.	It would be useful if this was cross referenced to Figure 30.	Clarity	As advised. Agreed.
p39, para 2.5.6.	4 th sentence - Reference to ' <i>reflect local styles</i> '.		'Local Style' should be clarified by referring to the character appraisal for local style. Agreed.
p39, para 2.5.7.	The first part of the sentence ' <i>Individual needs change</i> ' seems to have a word missing.	Clarity	" <i>Individual housing needs change but at any one time....</i> " Agreed.
p40/41, para 2.5.11.	We welcome the recognition of the role of a Rural Exception Sites.	N/A	N/A
p42, para 2.5.19	Format - the line space is missing from the top and bottom of this paragraph	Typo	Add lines spaces as advised. ?
p42, para 2.5.20	Reference could have been made to the ' <i>Design and Access Statements</i> ' required for some developments which should demonstrate what consultation has taken place in relation to access issues.	Clarity	As advised. Agreed.
p44, Policy HB 2	2.5.28. - Planning obligations for the contribution towards shop fronts, cycle parks and the public realm need to meet the 3 planning obligation tests. Any developer contributions must	Viability	"... Where appropriate, nNew development should contribute to enhancement work by the provision of ... " Agreed.

	be necessary to allow development, directly related to the development and proportionate.		
p44, Policy HB3	Aside from this policy being more appropriately placed in the 'Traffic and parking' section, we welcome this new policy addressing local mobility. 2.5.30. - Cross reference this to amended Policy TP 2, regarding charging of electric vehicles.	Clarity	Either move this policy to the 'Traffic and parking' section or add at the end of Policy HB 3 (2.5.30) "(see Policy TP 2)." Agree to latter suggestion.
p44, POLICY HB 4 Low impact access routes	As previously advised, this policy would be more appropriately placed in the 'Traffic and parking' section. These requirements may not be needed for all development proposals. Also the justification for this policy is missing. It is not clear what this policy actually trying to achieve? What is a 'low impact access route'? Also how should an applicant 'demonstrate' they relate to such routes e.g. some form of statement?	This policy addresses Parking issues. Viability	Move this policy to the 'Traffic and parking' section. Some developers will only look at this section. Suggest leave here and cross refer from T&P. "Where appropriate, new-development proposals should demonstrate how it relates to existing pedestrian and cycle routes" Agreed. The supporting text needs to set out how this would be demonstrated; i.e. it would need to be in a statement or graphically on a suitably scaled plan showing existing routes, the application site, and any possible routes within and about the site. We had intended not to support developments that compromised formal or informal pedestrian or cycle routes.
p45, Policy HB 5: Green living plan requirement	This new policy is unnecessary as it is far more basic and effectively duplicates Policy CE3.	Duplication	Delete Agreed but, as above, will developers read it in another section? Perhaps cross reference?
p45, Policy HB 6: Boundaries	2 nd sentence - this part is too restrictive and does not recognise all the other options available to provide wildlife access. Also, as previously advised, some evidence is needed for its inclusion.	Clarity & Evidence	"If hard boundaries are essential used, they should be of good quality brick and flint rather than fence panels, provision always being should be made for gaps to allow movement of small wildlife such as hedgehogs." Modified in Examiner's clarification note. Also some supporting text is needed.

p45, Policy HB 7: Utilities and signage	The reference to 'utilities' duplicates policy BT 1. Also evidence regarding signage is needed for its inclusion.	Duplication & Clarity	"Policy HB 7: Utilities and Signage - In the light of the potential visual impact on the Conservation Area visible utilities and signage should be kept to an absolute minimum". Agreed.
p45, Figure 31	It is disappointing that this figure only provides natural solutions for wildlife movement and not any physical ones, such as how a wooden fence, brick wall or wire fencing can accommodate this.	Clarity	See photographs of examples (at the end of these comments) to include which demonstrate other options. Thank you. We are aware of these but wish only use photos taken in New Buckenham. We have already referenced these in Design Guide B and for further information could provide footnote linking to https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/
2.6. Traffic and parking			
p48, bottom of the page	Format - the paragraph number is missing after para 2.6.17.	Typo	Add para No & amend all subsequent paragraph numbers. Do after text finalised.
p49, Policy TP 1 Highway developments	The way this policy has been re phrased is that it is now a Community Action not a planning policy, as it does not guide development.	Phrasing	Either amend to become a Community Action or delete. We feel strongly that the Parish Council has a policy to monitoring the traffic situation and be proactive in anticipating the impact of developments in the village and further afield. It's a policy but the wording could be altered accordingly.
p49, Policy TP 2: Impact of new building	1 st & 2 nd sentence - It is not clear what 'contribute to a reduction in risk' means? Risk of what - a reduced risk of collision, reduced risk of delays or congestion? This may prove difficult to implement and determine that risk on the road network has been reduced, as safety and operation of the highway is a complex matter.	A reduction in the risk goes beyond, and does not align with, the planning policy requirements elsewhere in the NPPF and Local Plan.	"Development will be expected to ensure there is no detriment to highway safety and, where possible, should contribute to a reduction in risk. On street parking is already congested for existing residents and visitors so provision of off street parking will be supported subject to complying with other policies in the Plan demonstrate how the proposals would seek to contribute to the safe and efficient operation of the road network ". Agreed.

			<i>The supporting text also needs to clarify how this could be achieved.</i>
	<p>2nd sentence - this is including supporting text within the policy which should be included in para 2.6.9.</p> <p>In light of Community action CA TP 1 and RHC 6 on electric vehicle charging points, and a recent recommendation in an Examiners Report, an additional paragraph at the end of this policy is needed to address this.</p>	Phrasing	<p>In 2.6.9 add: <i>“Parking is at a premium with most residential and visitor car owners having to use on-street parking”.</i></p> <p>New paragraph after the existing one: <i>“Where appropriate, all new dwellings are expected to provide the necessary arrangements to provide for the home charging of electric vehicles. The provision of communal vehicle charging points within the parish will also be encouraged.”</i></p> <p>Agreed.</p>
p49, Policy TP 3: Pedestrian safety	<p>2nd sentence - The use of ‘<i>shared access space</i>’ causes issues for people with visibility issues, particularly guide dog owners and long cane users. Also for people with learning difficulties, people with a hearing impaired, older people and young children can also have difficulty with such shared surface streets.</p>	<p><i>“Shared surface streets are dangerous for people with a vision impairment”.</i></p> <p>Guide Dogs</p>	<p>Delete This the view of a single organisation. Suggest read https://www.pps.org/article/what-is-shared-space Other than the B1113, New Buckenham has tiny streets and, if at all, poor pavements. The streets are, in effect, shared spaces.</p>
2.7. Business and tourism			
p55, Policy BT 2 Better communications for individual homes business	<p>As previously advised, such a policy may have viability implications, as it applies to all developments.</p> <p>Also there is nothing in the supporting text that clarifies what a ‘<i>Connectivity Statement</i>’ is or what ‘<i>easy connection</i>’ means?</p>	<p>Viability & Access to broadband is not a reason to refuse a planning application</p>	<p><i>“Where appropriate, Applications for new development mustshould contain a ‘Connectivity Statement’ to demonstrate easy the feasibility of securing connection to telecommunication and broadband services”.</i></p> <p>Agreed. The supporting text needs to justify why <u>all</u> development should produce this statement. Also include what a ‘<i>Connectivity Statement</i>’ should contain and what an ‘<i>easy connection</i>’ is. Suggest state: Applications for new development should state how buildings may get access to telecommunications and broadband.</p>

p55, Policy BT3	As worded, this policy is considered to be open ended, as any commercial development could be supported under this policy, if it could be considered to contribute to the local economy and local employment opportunities.		<i>“Sensitivity designed and appropriately scaled Bbbusiness and tourism development initiatives that support...”</i> . Agreed.
p55, para 2.7.19	CA BT 3 - As previously advised, the way this is worded comes across an instruction to a Parish Council, rather than action that will occur or be considered	Phrasing	Replace ‘ <i>should</i> ’ with ‘ <i>will</i> ’. Agreed.
2.8 Recreation, health and culture			
p61, Policy RHC 1	The policy. as amended, is too broad and ambiguous; with regard to what is ‘ <i>community life</i> ’ and by referring to ‘ <i>development</i> ’ catches all types of development, not just community facilities. It is difficult to interpret the policy, and the effect and value of policy maybe watered down as most developments could be argued to enhance some form of community life.	Clarity	Reword, to be more specific to what types of development this is referring to. Development other than for private housing Also further detail or refinement is needed to be included in the supporting text to make this clearer. Suggest add to 2.8.6: Further expansion of sustainable community facilities appropriate to the scale of the village would be welcome (Breckland Local Plan para 7.27-7.30) although tempered by the drawbacks of increased traffic and pressures on parking space. Increased nuisance from, for example, noise, light pollution and environmental damage, would not be welcomed. Policy RHC1 could be simplified to: Development that enhances community life in New Buckenham will be supported if there is no adverse impact on the village environment.
3. Summaries of Policies and Community Actions			
p62-68	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. Therefore it is not clear why the whole Policies and Community Actions have been reproduced in full.	Clarity	Replace with just the policy headings. Agreed.

4. Monitoring the Neighbourhood Plan			
p69,	4.1.3 - It would provide more flexibility to consider reviewing the plan rather than reviewing it as this may not be required and there is no regulatory requirement to do this. (Also see comments re p14, para 2.1.1).	Flexibility	<i>"The Plan is to be formally reviewed in the first instance five years, on a regular basis after the Plan is 'made'". OR</i> <i>"It will be considered whether tThe Plan is to be formally reviewed in the first instance every five years, after the Plan is 'made'". Latter agreed.</i>
5. Local design guide A: Building design checklist for Parish Council and developers			
p70	1 st paragraph - The design of new developments may impact on the historical social and economic context of the village. This could be in a positive way or be of an acceptable impact.	Clarity	<i>"1: Proposals for development are welcomed in the Plan's area if they can be demonstrated to sensitively respond to the historical..."</i> respond sensitively
p70	2 nd paragraph - Needs amending to correct typographical error.	Typo	<i>"2. The Local Authority ... is Breckland District Council . and attention - Attention is drawn to..."</i> Agreed.
p70	3 rd paragraph - This needs rephrasing as it implies that applications can be sent to the Parish for pre-app discussion	Clarity	3. <i>"... within the Plan's designated area. Whilst Breckland District Council is the local planning authority and offers a pre-application process, householders and developers are also ..."</i> Agreed.
	instead of Breckland. It needs to clarify that the Parish are not the Local Planning Authority and early discussion with them does not mean that they don't need to have pre-app discussions with Breckland.		
p70	6 th paragraph - This may not be appropriate in all development types.	Viability	<i>"6. Where feasible and practical, Ddevelopments should incorporate energy efficiency and ..."</i> Agreed.
p70	Paragraph 8.1 <i>"... in keeping..."</i> . The design of new developments may impact on the historical social and economic context of the village. This could be in a positive way or be of an acceptable impact.	Clarity	<i>"8.1. Be of high visual quality and respond sensitively with neighbouring buildings..."</i> Agreed, but should be '...and respond sensitively to neighbouring buildings...'
p70	Paragraph 8.2. The design of new developments may impact on the historical social and economic context of the village. This could be in a positive way or be of an acceptable impact.	Clarity	<i>"8.2. Sensitively respond to reflect local topography, ridge heights, window size, proportions, layout and plot sizes". Or</i> 'respond sensitively...'

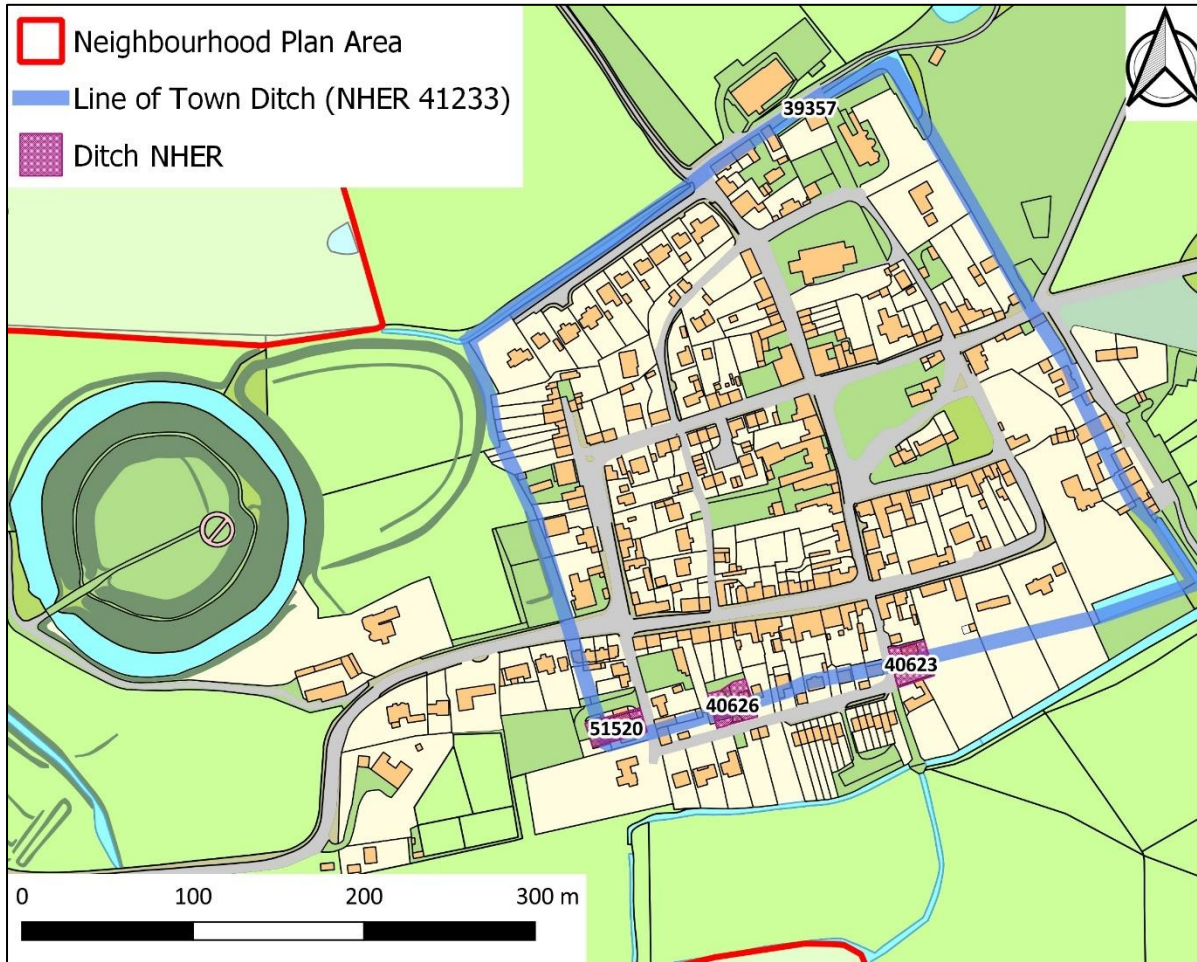
6. Local design guide B: Green living plan checklist			
p72	1st paragraph - This may be too onerous for all forms of development.	Viability	Proposals Planning applications for new developments, whether for new building, change of use or major conversions, will be required to submit a written should seek to incorporate elements of the Green Living Plan with planning applications as set out in Design Guide B as appropriate to ensure a coordinated approach to sustainable living in New Buckenham. In our view watered down too much.
9. Documents in support of this Neighbourhood Plan			
	There is some text missing, which would clarify what the document being referred to is.	Clarity	<input type="checkbox"/> A map of the Neighbourhood Plan area <input type="checkbox"/> Breckland press notice regarding the consultation on the proposed area designation <input type="checkbox"/> Old Buckenham Parish Council minutes 16.11.2016 confirming the inclusion of the Castle in its Parish within the Neighbourhood Plan Area <input type="checkbox"/> Designation decision notice of the New Buckenham Neighbourhood Plan Area Agreed.
	<p>Also the link to the 'Old Buckenham Parish Council minutes 16.11.2016' is not working.</p> <p>The link to the 'Breckland SEA screening decision notice' should be for the 'Report', not 'Decision Notice'.</p> <p>This is the link to the "Breckland HRA screening (decision) Report' and not the 'Decision Notice'.</p>	Errors	<p>Amend website link.</p> <p>Replace the text 'Brecklad SEA screening decision notice' with 'Breckland SEA screening Report' and add the correct document.</p> <p>Replace the text 'Breckland HRA screening decision notice' with 'Breckland HRA screening Report'.</p> <p>Both agreed.</p>

Photograph examples for comments on p45, Figure 31



<https://www.hedgehogstreet.org/>

Figure 11 Line of Town Ditch (revised)



Please note that there is no 'purple patch' under NHER ref 39357 at the top of the map as, in contrast to the others, it has not been excavated. It is open for all to see. A note in italics under the map could be inserted.

Figure 16 Map of Open Spaces designated by Breckland (revised)

Please note that this varies slightly from the map in Breckland's Open Space Parish Schedule, page 185.

The Common (NB8) extends west, along the thin strip of land north of NB7 to include the pond as correctly shown in this NP map. This is in contrast to the Breckland map which omits this strip. See detail.

