# Swanton Morley Neighbourhood Plan



Consultation Statement

Prepared on behalf of Swanton Morley Parish Council by:

ABZAG

NEIGHBOURHOOD PLANNING AND PROJECT MANAGEMENT

# If you would like this document in large print, or in any other format please contact Parish Clerk, Swanton Morley Parish Council, parishcouncil@swantonmorley.org.uk or telephone 01362 637166

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# **Consultation Statement**

# 1.0 Executive Summary

- 1.1. This Consultation Statement has been written to support the Swanton Morley Neighbourhood Plan. Its main purpose is to meet the statutory requirements of the Neighbourhood Planning (General) Regulations 2012 and subsequent updates and amendments; setting out how the requirements of Regulation 14 and 15 have been satisfied and complied with.
- 1.2. Captured within this document is a summary of the community consultation process carried out in developing the Swanton Morley Neighbourhood Plan, explaining how each of the activities and events were undertaken, with details of the responses received from local residents and stakeholders.
- 1.3. Through the pre-submission consultation residents raised a number of concerns and issues; using their words the key messages from the local community are listed below: -

#### 🔸 Involve local people .....

"The plan is comprehensive and I can only hope that development takes heed of the content"

"...... take account of local wishes"

"...... a fantastic job with the plan - it is most impressive!"

### 🖊 Flooding worries .....

"Flood risk assessments must be backed up by more than words"

"Sewage capacity has not been mentioned. This is of great concern"

"...... agree very strongly with this, having had 6" of water (mixed with sewage) all round my bungalow"

"The water in the aquifers and the river must be protected."

### </u> Traffic impact .....

"The volume of traffic is horrendous now. Any more will be a nightmare"

"...... actually quieter living in a town suburb than living on the road through Swanton Morley"

"...... need to be encouraging more cycling and walking, particularly to school, pubs and shops"



### Housing and affordability .....

"Affordable housing is desperately needed, particularly for the young"

"Affordable properties must take president over large "executive" homes"

"If family housing is proposed it is desirable for it be within easy walking distance of the school."

"...... the whole topic of "affordable" needs to be reconsidered"

"There must be allowance for village people to rent/buy affordable."

"Affordable housing should mean affordable today but also affordable to live in"

"Local housing should be available to local people."

#### Consequence of growth .....

"Whilst developments are inevitably needed due to a growing population, I hope that the core of Swanton Morley village will remain a close knit, positive and supportive village"

"Hopefully any new development will enhance the village not detract; there are enough ugly developments in the area"

"Swanton Morley is growing too big too fast. It will soon become a small town which is not wanted by the majority of residents"

"Landscaping should be sympathetic and green spaces respected"

"In 2017, mobile signal and internet both a must, not a want!"

"Diversity is something to celebrate as long as the emphasis is on integration"

1.4. Each of these comments, plus many more, have been addressed in the responses given in Appendix 16 of this document and where possible through the updated Swanton Morley Neighbourhood Plan.

# "Thank you for working hard for the Swanton Morley community, for being our voices and allowing our voices to be heard."

Voiced by a Swanton Morley resident replying to the Pre-submission consultation.

# 2.0 Introduction

# 2.1. Background

2.2. The Swanton Morley Neighbourhood Plan has been informed through extensive community consultation and research.

2.3. The Neighbourhood Plan builds upon the findings of the Village Appraisal of 2004 and is the result of the residents of Swanton Morley and stakeholders working together to have their say on future development in Swanton Morley.

A Steering Group comprising 2.4. volunteers from across the community has, with the support of consultants, led on the development of the Neighbourhood Plan and initiated comprehensive programme a of community involvement and engagement over of а period eiahteen months.

2.5. In developing the Swanton Morley Neighbourhood Plan, the Steering Group has analysed a substantial amount of data from the consultation events, supplemented with historic data taken from Census records, Historic England and other sources.

# 2.6. Consultation Requirements

2.7. The Consultation Statement has been prepared to fulfil the legal obligations of Regulation 14 and Regulation 15 of the Neighbourhood Planning Regulations 2012 (and subsequent updates).

2.8. This document summarises the community consultation process that has been undertaken in developing

the Swanton Morley Neighbourhood Plan and demonstrates how the requirements of Regulation 14 and Regulation 15 have been met.

2.9. Section 15(2) of Part 5 of the Neighbourhood Planning Regulations sets out that a Consultation Statement should:

- a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) explain how they were consulted;
- c) summarise the main issues and concerns raised by the persons consulted; and
- d) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

2.10. Section 3.0 of this document outlines how requirements of Regulation 15 have been met.

2.11. Section 4.0 and the appendices contain further supplementary detail.

2.12. Section 5.0 of this document demonstrates how the obligations of Regulation 14 have been fulfilled.

# 3.0 Summary of Key Stages, Events and Initial Consultation

# 3.1. Overview

3.2. Swanton Morley Parish Council has led on the production of the Swanton Morley Neighbourhood Plan.

3.3. Work commenced in May 2015 when the Parish Council considered the benefits a Neighbourhood Plan would bring to the local community and resolved to produce a Neighbourhood Plan for Swanton Morley.

3.4. Applying а designated for Neighbourhood forming Area, a Steering Group to undertake the detailed preparation of the Neighbourhood Plan with the support of consultants from Abzag Ltd.

3.5. This Consultation Statement, In accordance with Section 15(2) in Part 5 of the Neighbourhood Planning Regulations, sets out full details of the key stages and events, as well as the additional events and activities that have taken place.

# 3.6. Key Stages

# 3.7. Designate Neighbourhood Area

3.8. On 28<sup>th</sup> May 2015 Swanton Morley Parish Council applied to Breckland District Council, the local planning authority, for designation of a Neighbourhood Area.

3.9. In the application, the Parish Council requested the neighbourhood area to be covered by the Swanton Morley Neighbourhood Plan should comprise the whole parish of Swanton Morley following existing parish boundaries (see Appendix 1).

3.10. Breckland District Council publicised the application and advertised a six- week consultation period. Following the statutory consultation, Breckland District Council approved the application and on 6<sup>th</sup> July 2015 the Parish of Swanton Morley was designated as Neighbourhood the Area (see Appendix 2).

# 3.11. Formation of a Steering Group

3.12. Edition 1 of the Neighbourhood Plan Newsletter delivered to every house and business in Swanton Morley invited members of the community to join the Steering Group.

3.13. At the launch community event attendees were asked if they were interested in joining the Steering Group.

3.14. A number of residents and Parish Councillors put forward their names to join the Steering Group.

3.15. Swanton Morley Parish Council agreed a Terms of Reference for the Steering Group (see Appendix 3).

3.16. The Steering Group met for the first time on 13<sup>th</sup> January 2016 and has continued to meet regularly throughout the development of the Swanton Morley Neighbourhood Plan.

3.17. Meeting dates, agendas and minutes of the Steering Group were shared on the Neighbourhood Plan webpage of the Parish Council website (see Appendix 7).

### 3,18. Events & Initial Consultation

3.19. A number of public consultation events and activities have taken place at key stages during the development of the Swanton Morley Neighbourhood Plan.

3.20. The consultation events took place at the Village Hall, Manns Lane in Swanton Morley.

### 4 October 2015

Launch and initial public consultation event to ask residents, consultees and stakeholders their views on Swanton Morley, and to seek volunteers to form a Steering Group;

### **Wovember 2015**

Second public consultation event to report back from the initial consultation and to develop Vision and objectives for the Neighbourhood Plan;

#### **February 2016**

Third public consultation event to test the Vision and Objectives and to seek views on statements that could be developed into policy areas and actual policies;

#### April to November 2016

A series of open Steering Group meetings where each of the emerging statements and suggestions were reviewed. Policies were developed, drafted and tested to include phrasing, understanding and review of ambitions to align to the desired outcomes.

### 🖊 January 2017

'Pre-submission consultation' on the draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report. The statutory consultation six-week period commenced 12<sup>th</sup> on 24<sup>th</sup> January and closed on February 2017.



Swanton Morley Consultation Statement v1

# 3.21. Communication

3.22. Extensive consultation has been undertaken throughout the neighbourhood planning process to ensure that the Swanton Morley Neighbourhood Plan is fully informed by the views of the community and other stakeholders.



3.23. A Communication Strategy was written and implemented by the Neighbourhood Plan Steering Group (see Appendix 4).

3.24. To ensure the consultation process was as inclusive as possible a wide range of communication methods have been used:

- A series of public consultation events held in the Village Hall in Swanton Morley;
- Newsletters, delivered at key stages, to every household and business in Swanton Morley (see Appendix 5);



- A dedicated webpage about the Swanton Morley Neighbourhood Plan on the Parish Council website;
- ♣ Use of social media including Facebook ♣ and Twitter ◄
- Progress reports to Swanton Morley Parish Council with an opportunity, through public participation, for residents to ask questions;
- Open meetings of the Neighbourhood Plan Steering Group to enable public participation;
- Publication of the Steering Group agendas and minutes on the website;



- Updates in the 'LINK UP' Parish Magazine and in the Parish Council's newsletter 'The Mardler' (see Appendix 6); and
- Press releases in the local newspaper to communicate progress, to publicise events and give details of the pre-submission consultation (see Appendix 10).

3.25. Further detail about each of the above events and activities is given in Section 4.

# 4.0 Events and Activities

- 4.1. The Swanton Morley Neighbourhood Plan has been informed by an extensive range of consultation events and activities, which have been undertaken as part of the neighbourhood planning process.
- 4.2. This section provides further detail about the various events and activities and explains:
  - Who was consulted
  - How they were consulted
  - What response was received



# 4.3. Swanton Morley Neighbourhood Plan Newsletter

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Each household & business in Swanton Morley. People attending each of the public consultation events, in Swanton Morley Village Hall, where copies of the newsletters were also made available.	Newsletters were produced and hand-delivered at key stages during the neighbourhood planning process to: raise awareness of the consultation events and encourage community involvement in the development of the Neighbourhood Plan; share information, encourage feedback and provide progress updates about the neighbourhood plan process; and recognise the agencies providing financial and technical support to	A good response was
	help develop the Neighbourhood Plan (see Appendix 5).	

# 4.4. Parish Magazine and Parish Newsletter Articles

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Households and businesses throughout the village of Swanton Morley and neighbouring villages. The 'LINK UP' is a monthly parish magazine for the villages of Swanton Morley, Hoe, East Bilney and Beetley.	published about the Neighbourhood Plan as it is has developed. Highlighting details of the public consultation events, how to get involved and how to comment on the pre-	Little direct feedback has been received, although residents at the events commented on the content and their support for the Neighbourhood Plan.

### 4.5. Website

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Anyone who has access to a computer, tablet or smartphone.		•

# 4.6. Facebook and Twitter

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Individuals and organisations registered to the social media sites (Facebook and Twitter).	were used to promote	exchanged. There were a number of 'likes' and 're-

	community	events.	(see
	screen shots	in Appen	dices
	8 and 9).		

### 4.7. Press Releases

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Readership (individuals or organisations) with access to the Dereham Times newspaper in which the articles were published.	Articles were published to report on the agreement of the vision and objectives for the Neighbourhood Plan, promote events and most importantly to advertise the pre-submission consultation period and how to comment (see Appendix 10).	Whilst no direct feedback was received it is understood that the press releases helped to keep the wider audience informed.

### 4.8. Statutory Consultation

4.9. In accordance with the Neighbourhood Planning Regulations 2012 (and subsequent updates) the following statutory consultations were undertaken:

# 4.10. Application for Designation of the Swanton Morley Neighbourhood Area

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Statutory bodies, key stakeholders, parish and town councils, residents and individuals with access to Breckland district Council's website.	Breckland District Council publicised the application and statutory consultation period using electronic notifications to stakeholders, including neighbouring parishes. All details were held on Breckland District Council's website.	Breckland District Council advised that it had received no representations on the proposed Plan area during the prescribed period, nor has additional comments on the proposed boundary. Furthermore, the Council had not received any other applications to designate a Neighbourhood Plan that would affect the confirmation of the proposed Plan area set out in the application. Breckland District Council approved the designation of the Swanton Morley Neighbourhood Area on 6 <sup>th</sup> July 2015 (see Appendix 2).

4.11.	Sustainability	<b>Appraisal</b>	Scoping	Report
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WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
The following consultees were invited to comment on the Sustainability Appraisal Scoping Report:-	A written invitation dated 12 <sup>th</sup> July 2016 was emailed to each of the consultees.	All consultees responded with the exception of Norfolk Wildlife Trust.
<ul> <li>Environment Agency</li> <li>Historic England</li> <li>Natural England</li> <li>Norfolk Wildlife Trust</li> <li>Breckland District Council</li> <li>Norfolk County Council</li> </ul>	The letter explained why the consultation was being undertaken, the deadline for responses and an electronic copy of the Sustainability Appraisal Scoping Report (July 2016) was attached.	The comments received from the consultees were generally positive and supportive of the approach being taken in developing the Swanton Morley Neighbourhood Plan. Each response, together with the actions resulting from the consultees comments are reproduced in full in the Sustainability Appraisal Scoping Final Report (October 2016).

# 4.12. Pre-Submission draft Neighbourhood Plan and Sustainability Appraisal Report

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Residents and businesses of Swanton Morley, statutory consultees and stakeholders were consulted. (See section 5.12. and 5.13. of this document for further detail)	were used to publicise the pre-submission consultation. These included: - • Newsletter	each of which is recorded in
	A supporting pre-submission community consultation event on 14 <sup>th</sup> January 2017 with Steering Group members present to answer questions, explain in more	

detail what was being consulted on and the process involved.	
(Further detail is given in sections 5.6. through to 5.11. of this document).	

# 4.13. Habitat Regulation Assessment Screening Report

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Natural England as the responsible statutory body.	The Habitat Regulation Assessment Screening Report (May 2017) was issued to Natural England to request their 'opinion' on the approach taken, the outcomes and conclusion.	2017 that it agreed with the findings of the Habitat Regulation Assessment

# 4.14. Strategic Environmental Assessment Determination

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
<ul> <li>The following consultees were notified of the determination and sent a copy including the reasons:-</li> <li>Environment Agency</li> <li>Historic England</li> <li>Natural England</li> </ul>	Notification was via email directly to each of the Statutory Bodies explaining the determination and enclosing a copy of the Examination Version of the Neighbourhood Plan, the Sustainability Appraisal Scoping Final Report and Sustainability Appraisal Final Report.	the 8 <sup>th</sup> June 2017 to advise it "has no issues to raise regarding the SEA." Natural England's full response can be seen in Appendix 1 of the Habitat Regulation Assessment

# 4.15. Community Consultation

4.16. A number of public consultation events were held at Swanton Morley Village Hall to encourage community involvement in the development of the Neighbourhood Plan.

- 4.17. Each event was publicised in the following ways:
  - A Swanton Morley Neighbourhood Plan newsletter was delivered to every household and business in Swanton Morley (see Appendix 5).
  - The Mardler (see Appendix 6).
  - Social Media Facebook & Twitter (see Appendices 8 and 9).
  - Posters were displayed around the village and in the General Store and Post Office (see Appendix 5).



- Invites were sent to consultees and stakeholders (see Appendix 12).
- A large 'Neighbourhood Planning' banner at the entrance to the Village Hall.

4.18. The following events were held at key stages during the neighbourhood planning process:

- Neighbourhood Plan Launch Event
- Vision and Objectives Community Consultation Event
- Emerging Policy Statement Community Consultation Event
- Policy Development Workshops
- 'Pre-Submission' Community Event



#### 4.19. Neighbourhood Plan Launch Event

#### Date: 17<sup>th</sup> October 2015

#### Location: Swanton Morley Village Hall, Manns Lane

	AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
×	To launch the Swanton Morley Neighbourhood Plan and explain the neighbourhood planning process.	everyone and anyone. Residents and businesses of Swanton Morley, consultees and key stakeholders were	The public consultation event was structured around a number of interactive displays designed to prompt residents, consultees and stakeholders to share their views and opinions.
X	To gather the views of residents, consultees and stakeholders about Swanton Morley (what they like most, like least and what improvements could be made).		There was a great deal of information presented on neighbourhood planning and the process involved. Copies of Localities' 'Road Map' were used as a visual aid.
×	To seek volunteers to join the Neighbourhood Plan Steering Group to lead on the development of the Neighbourhood Plan.		A presentation was projected on to the wall and run on a 'loop' to give more information and enable people to sit down and watch.
×	Outline the timescale and next actions.		Members of the Parish Council answered questions and explained how to get further involved; encouraging people to join the Steering Group.

#### WHAT RESPONSE WAS RECEIVED

Breckland District Council responded by email thanking for the invitation to attend (see Appendix 13 for a copy of the email).

Those attending the event, cira 47, including local landowners and a developer, recorded their opinions and comments on a range of display boards, including where they lived by placing a coloured dot on the designated Neighbourhood Area map (see Appendix 11).

The presentation on the neighbourhood planning process and how the local community can and should get involved was well received. As was the newsletter, which prompted questions on what was involved and how to join the Steering Group.

Those attending were also asked if they would be interested in getting more involved by joining the Neighbourhood Plan Steering Group.

#### 4.20. Vision and Objectives Community Consultation Event

### Date: 14<sup>th</sup> November 2015

Location: Swanton Morley Village Hall, Manns Lane

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul> <li>To keep people engagement in the process and able to freely express their thoughts.</li> <li>To share feedback from the launch event about what the community liked most, liked least and would wish to change about Swanton Morley.</li> <li>To gather views of residents and stakeholders on what should be the Vision and Objectives of the Neighbourhood Plan.</li> <li>To continue to explain the neighbourhood planning process and the next stages.</li> </ul>	The event was open to everyone and anyone. Residents and businesses of Swanton Morley, consultees and key stakeholders were invited to attend the event and have their say.	The consultation event was structured around a number of interactive displays designed to prompt people attending to express their views on areas to focus on as suggested objectives, as well as sharing their thoughts on what should be in the Vision for Swanton Morley in 15 to 20 years. The outcomes of the initial consultation event were presented on display boards. Illustrating how local residents had commented. A presentation was projected on to the wall and run on a 'loop' to give more information and enable people to sit down and watch at their pace. Members of the Steering Group answered questions and explained the process.
	WHAT RESPONSE WAS RECEIVED	)
The event was well supported with local residents attending. Of particular interest was the feedback and analysis from the initial community event prompting questions about what could really be done and would the Neighbourhood Plan make a difference.		
Residents expressed their thoughts on aims and objectives, as well as making suggestions for the Vision for Swanton Morley.		
Many people were very concerned; having heard about lots of development coming to Swanton Morley and wanting to know how much, where it would be built and how		

The Steering Group was also discussed at length with two further residents wanting to become members.

Attendees also indicated where he or she lived by placing a coloured sticky dot on the designated Neighbourhood Area map (see Appendix 11).

would the village cope.

#### 4.21. Emerging Policy Statement Community Consultation Event

#### Date: 13<sup>th</sup> February 2016

Location: Swanton Morley Village Hall, Manns Lane

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
To share the agreed Vision and Objectives that emerged from the previous consultation event.	The event was open to everyone and anyone. Residents and businesses of Swanton Morley, consultees and key stakeholders were	The consultation event was structured around a number of interactive displays designed to prompt residents and stakeholders to express their views on emerging policy
<ul> <li>To discuss and develop possible emerging policy statements to include in the Neighbourhood Plan.</li> <li>To understand what residents did and did not support for the village.</li> <li>To continue to explain the neighbourhood planning process and next stages.</li> </ul>	invited to attend the event and have their say.	statements. The statements were grouped into six policy themes and those attending the event were asked to rate each statement from 'Strongly Agree' to 'Strongly Disagree'. Also, if they had other suggestions to write them on 'post-it' notes and add these to the display boards.
		Members of the Steering Group answered questions and explained the process.

#### WHAT RESPONSE WAS RECEIVED

The event was very well supported with just over 100 people attending. The newletter, issued the preceding week with the different development sites being promoted, was effective at prompting interest, getting people to attend and developed a lively debate on the pro's and con's of development.

Of particular concern was the possible scale of development, its location and the impact it would have on the existing village and its infrastructure.

The agreed Vision and Objectives were well received and people recorded their opinions and comments on a range of display boards and maps, expressing interest in how they could influence the future development in the area.

As usual, attendees also indicated where he or she lived by placing a coloured sticky dot on the designated Neighbourhood Area map (see Appendix 11).

### 4.22. Policy Development Workshops

Date: April through to November 2016

Location: Swanton Morley Village Hall, Manns Lane

<ul> <li>policy writing and the do's and don't's.</li> <li>To review all the suggested policy areas and agree key areas to be taken forward to develop into policies.</li> <li>To develop understand the intent and aspiration of what each policy is intended to deliver.</li> <li>To set the context of the planning policies.</li> <li>To evidence and justify policies for Swanton Morley.</li> <li>Steering Group and Parish Councillors participated in the series of meetings.</li> <li>Steering Group and Parish Councillors participated in the series of meetings.</li> <li>To review all the series of meetings were advertised with any local residents welcome to attend and observe.</li> <li>To develop understand the intent and aspiration of what each policy is intended to deliver.</li> <li>To set the context of the planning policies.</li> <li>To evidence and justify policies for Swanton Morley.</li> </ul>	meeting was set up as an ctive workshop facilitated ocal planning consultant. tline on policy writing was as an introduction. eering Group collectively d through all of the stions and ideas, using nerging Policy Statement sion Document, the ne data and objectives policies to resolve. ng out the linkages een the issue to outcome, itent of the policy and s intent and usage could king to ensure each was justified, deliverable upported the delivery of sion for Swanton Morley.

#### WHAT RESPONSE WAS RECEIVED

Working through the different policy options, testing outcomes against expectations and discussing possible interpretation was a valuable exercise for the Steering Group as it gave an insight into the complexity of policy writing and the dangers of 'unintended' outcomes against the intended ones.

The initial policies for the Neighbourhood Plan were agreed, as were the ambition statements, ultimately enabling the Pre-submission Version of the Neighbourhood Plan to be drafted.

# 4.23. 'Pre-Submission' Community Event

#### Date: 14<sup>th</sup> January 2017

#### Location: Swanton Morley Village Hall, Manns Lane

	AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
ж Ж	To publicise the statutory consultation of the pre- submission draft Swanton Morley Neighbourhood Plan. To share the Pre- Submission version of the Neighbourhood Plan, help local residents understanding and to answer questions. To raise awareness of the consultation, encourage responses from residents and stakeholders and to highlight the deadline for comments. To explain the next steps in the neighbourhood plan process.	The event was open to everyone and anyone. Residents and businesses of Swanton Morley, consultees and key stakeholders were invited to attend the event and have their say.	The pre-submission consultation event was structured around a series of display boards set up to highlight the draft policies, the supporting text for each and their ambition. To provide information about next steps and actions to be taken. An area was set-aside for attendees to sit down, with a cup of tea, and complete their Response Form with members of the Steering Group on hand to answer questions and provide support.
	WHAT RESPONSE WAS RECEIVED		
Residents and stakeholders attended the 'Pre-Submission' Consultation event, asking many questions of members of the Steering Group about the policies and how they would help the local community. A number of people who attended completed feedback response forms at the event. These have been recorded, with all of the responses received, within the Pre-Submission Consultation			



Responses (see Appendix 16).

# 5.0 Pre-submission (Regulation 14) Consultation

# 5.1. Background

5.2. This section of the Consultation Statement demonstrates how the Swanton Morley Neighbourhood Plan pre-submission consultation fulfills Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This regulation requires that:

# 5.3. "Before submitting a plan proposal to the local planning authority, a qualifying body must –

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area [with]
  - (i) details of the proposals for a neighbourhood development plan;
  - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;
  - (iii) details of how to make representations; and
  - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority."

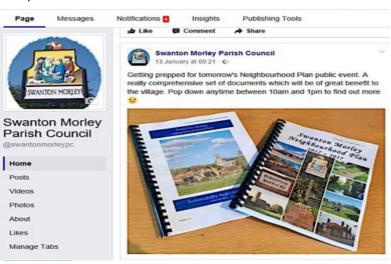
# 5.4. Formal Pre-submission Consultation Period

5.5. The pre-submission draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report were prepared and circulated for a statutory consultation period running from 12<sup>th</sup>January 2017 until 24<sup>th</sup> February 2017.

# 5.6. How it was publicised?

5.7. Residents, businesses of Swanton Morley, stakeholders and statutory consultees were informed of the commencement of the pre-submission consultation on the draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report.

- 5.8. Details of how to see and comment on the documents including the consultation date were publicised using a wide range of media to ensure the message was communicated as widely as possible:
  - Neighbourhood Plan Newsletter (Edition 3, January 2017) hand-delivered to every household and business in Swanton Morley (see Appendix 5).
  - The Mardler (34<sup>th</sup> Edition, January 2017) explained how to take part in the consultation (see Appendix 6);
  - Press releases in Dereham Times, the local newspaper (see Appendix 10);
  - Social media using posts on Facebook and Twitter (see Appendices 8 and 9).



- The Neighbourhood Plan webpage on the Parish Council website <u>www.swantonmorleyorg.uk</u> explained the process, key dates, how to comment. The electronic copy of the documents available online to download from 12th January 2017;
- Printed copies of the pre-submission version of the Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report where available to view at the Village Hall, whilst blank Response Forms were available to complete.
- 5.9. Statutory consultees and other stakeholders were informed of the start of the pre-submission consultation by email and invited to review and comment on the draft Swanton Morley Neighborhood Plan and Sustainability Appraisal Report by 24<sup>th</sup> February 2017.
- 5.10. The email also included an invite to the pre-submission community event on 14<sup>th</sup> January 2017 (see Appendix 12).
- 5.11 Two further email reminders were sent to stakeholders on 12<sup>th</sup> and 24<sup>th</sup> January 2017 advising again of closing date.

# 5.12 Who was consulted

5.13 A list of key stakeholders comprising residents, landowners, local businesses, neighbouring parish councils, Breckland District Council, Norfolk County Council, statutory consultees, developers and key service providers.

# 5.14. Document Access

- 5.15. Copies of the pre-submission draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report were made available in both paper and digital formats.
  - Paper copies of the draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report were made available to view at the Village Hall, at the pre-submission public consultation event at the Village Hall on the 14<sup>th</sup> January 2017.
  - Paper copies of the draft Swanton Morley Neighbourhood Plan, including an A3 large print version, and Sustainability Appraisal Report were available to view at the Parish Office in the Village Hall.
  - Digital copies of the draft Swanton Morley Neighbourhood Plan and Sustainability Appraisal Report were available online to download with the Response Form from the Parish Council website www.swantonmorley.org.uk

# 5.16. Response Methods

- 5.17. To encourage feedback on all areas of the pre-submission draft Neighbourhood Plan and Sustainability Appraisal Report a Response Form was produced and all consultees were invited to give their comments by completing and returning the Response Form.
- 5.18. The Response Form was available to download from the website as a standalone document, it was also included as an Appendix to the draft Swanton Morley Neighbourhood Plan.
- 5.19. Printed copies of the Response Form were handed out to everyone at the 'Pre-Submission' community event on 14<sup>th</sup> January 2017.
- 5.20. The completed Response Forms were to be returned to the Swanton Morley Parish Council Office, at the Village Hall, either by hand or post. Or electronically by emailing directly to the Parish Clerk. A number of Response Forms were completed and handed in at the Pre-submission event on Saturday 14<sup>th</sup> January 2017.

# 5.21. Reponses Received

5.22. In total, 49 consultation responses were received by the end of the formal consultation period, which ended on 24<sup>th</sup> February 2017. As part of the Response Form consultees were asked whether they agreed (yes or no) with each of the policies, to state fully and clearly their comments or concerns against each policy, what changes or alternative approach should be

taken. The Response Form also requested if there were any omissions from the draft Swanton Morley Neighbourhood Plan and asked for views on the Sustainability Appraisal Report.

### 5.23. Summary of Main Issues & Concerns

- 5.24. All 49 of the complete Response Forms returned during the consultation have been reproduced in full in Appendix 16. The main issues and concerns raised by consultees are summarised below -
  - Impact of development and where new housing will be built
  - Flooding caused by new development
  - Affordability of houses
  - 🔸 Housing to local people to access; both to buy and rent
  - Ability of school and doctors to cope with increase numbers
  - Speeding traffic, road safety and rat running through the village
  - 4 Ability of the sewage system to cope now and increase capacity
  - Housing mix; the need for more smaller dwellings as too many big houses being built
  - The plan is comprehensive and it is hoped that development takes heed of the content.
  - Local involvement in decisions effecting Swanton Morley residents and the village
  - **4** Broadband access and mobile signal strength
  - **4** Keeping Swanton Morley a separate village



### 5.25. Addressing Issues and Concerns

- 5.26. The Steering Group considered each of the issues and concerns raised through the Pre-submission consultation. An agreed response has been drafted, including any actions and amendments to the draft Swanton Morley Neighbourhood Plan, and recorded (see Appendix 16) for each of issues and concerns raised.
- 5.27. Where considered relevant, details are also recorded to indicate how the issue or concern has been addressed in the draft Swanton Morley Neighbourhood Plan.

# 6.0 Conclusion

- 6.1. This Consultation Statement documents the consultation activity that took place as part of developing the Swanton Morley Neighbourhood Plan.
- 6.2. It provides evidence that in producing the draft Swanton Morley Neighbourhood Plan there has been a significant amount of successful consultation with the local community, stakeholders, consultees and businesses that potentially have a stake in the future of Swanton Morley and the Neighbourhood Plan.
- 6.3. The Consultation Statement documents shares the feedback received during the neigbourhood planning process, the comments made through the consultations and, where necessary and appropriate, how the comments received have been considered in developing the draft Swanton Morley Neighbourhood Plan.
- 6.4. The draft Swanton Morley Neighbourhood Plan has sought to take account of these comments where necessary and appropriate to comply with the Government's National Planning Framework, the strategic Core Strategy and emerging Local Plan.
- 6.5. This Consultation Statement and the supporting consultation reports are considered to comply with Section 15(2) in Part 5 of the 2012 Neighbourhood Planning Regulations.



# 7.0 Appendices

# Appendix 1

Neighbourhood Area Application



# SWANTON MORLEY PARISH COUNCIL

Parish Clerk: Mrs Faye LeBon 32 Humbletoft Road Dereham, NR19 2RT Tel: 01362 637166 Email: parishcouncil@swantonmorley.org.uk



28th May 2015

Planning Policy Team Breckland Council Elizabeth House Walpole Loke Dereham Norfolk NR19 1EE

Dear Sirs,

#### NEIGHBOURHOOD PLAN STATEMENT

Swanton Morley Parish Council, being a relevant body under Section 61G of the Town and Country Planning Act 1990, hereby submits this application for a neighbourhood area, to be covered by a Neighbourhood Plan, as detailed in Section 5 of The Neighbourhood Planning (General) Regulations 2012.

A map of the area to be covered, the boundaries of which are highlighted in red, is attached. The proposed neighbourhood area is to include the whole parish of Swanton Morley, and will follow the existing boundaries of the parish. The Parish Council considers this area appropriate so as to not infringe on any adjacent parishes. It is not considered necessary to incorporate neighbouring parishes as Swanton Morley has a logical and defensible boundary having no significant housing from neighbouring parishes anywhere near the Swanton Morley parish boundary.

The purpose of the plan is to give local people more say about the way in which Swanton Morley will grow in the years ahead and maintain a good quality of life for all of its residents.

The Neighbourhood Plan will consider the following issues:-

- 1) Vision To set out the long term vision for Swanton Morley for the lifetime of the plan.
- Housing To consider the evidence based housing needs of Swanton Morley residents.
   Business To consider the need for additional business premises, the possible
- conversion of derelict buildings and increased employment opportunities.
- 4) Strategic Housing Land Availability Assessment The neighbourhood plan will pay particular attention to the new SHLAA and consider alternative areas of land even if they have not been put forward for consideration at this time by the landowners as part of the LPA's recent consultation.
- 5) Highways To consider the suitability of the existing road network in Swanton Morley and its ability to cope with any additional development based on local knowledge. In particular significant corridors of movement (ie. safe route to the school) will be considered.
- Landscape sensitivity To consider the impact of any additional development on the village's unique landscape character particularly in relation to the Wensum Valley.
- Environment To consider the impact of any additional development on the natural environment.
- Design Quality To consider adopting a broad generic specification for the appearance of any additional development in terms of materials and construction techniques to be used.

Page 1 of 2

- Transport The plan will consider, based on local knowledge, the suitability of existing public transport in terms of providing a good level of accessibility to local services.
- 10) Settlement Boundary To consider redefining the existing settlement boundary.
- 11) Open Space To consider the need for additional green open spaces to provide additional play and sports facilities. 12) Sustainability – To take account of the ability of local services such as the Doctor's
- Surgery and School to cope with any additional development.
- 13) Robertson Barracks To take account of the long term future of the Barracks and risk assess the possible affects any future closure might have on the village and its services.
- 14) Local Area Plan The Neighbourhood Plan will take account of policies incorporated in Breckland Council's LAP.

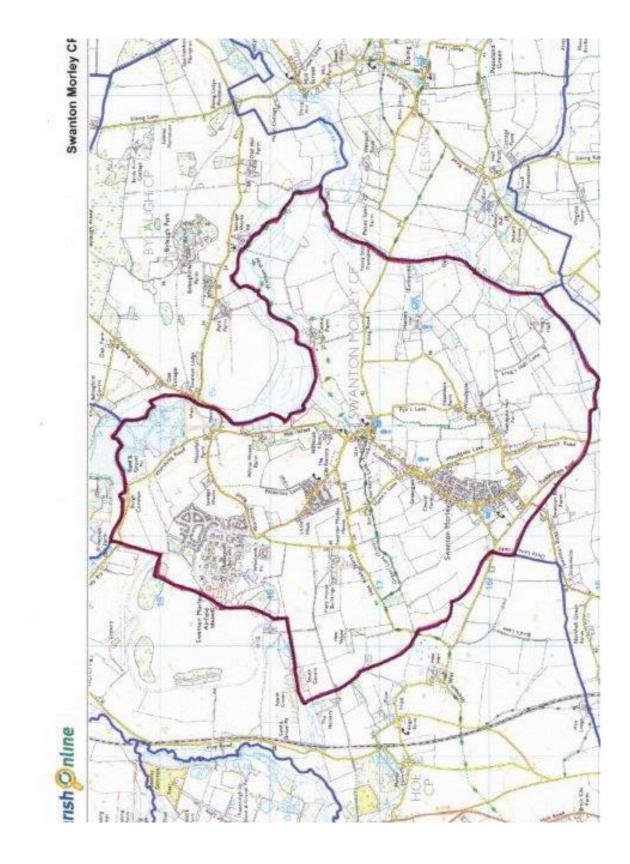
I trust that this meets with your approval and we look forward to receiving confirmation in the near future that our application has been approved. If in the meantime you require further information, please do not hesitate to contact us.

Yours Sincerely



Roger Atterwill Chairman, Swanton Morley Parish Council

Page 2 of 2



# Appendix 2

Approval of Neighbourhood Area Designation

Letter from Breckland District Council



Faye LeBon	Your Ref:	
Clerk to Swanton Morley Parish Council	Our Ref:	
	Contact: Phil Mileham Direct Dial: 01362 656803 Email:phil.mileham@breckland-sholland.gov.uk Date: 06 July 2015	

Dear Faye,

#### Swanton Morley Neighbourhood Plan - Confirmation of Plan area designation

Thank you for your letter dated 28<sup>th</sup> May 2015 in respect of the above, the accompanying area map and subsequent statement to support the preparation of your Neighbourhood Plan.

Firstly, I can confirm that Breckland Council is satisfied that Swanton Morley Parish Council is a relevant body for the purposes of Section 61G of the Town and Country Planning Act (1990). The Council has publicised the proposed plan area as required by Regulation 6 of the Town and Country Planning, Neighbourhood Planning (General) Regulations 2012 as amended.

I can advise that the Council received no representations on the proposed Plan area during the prescribed period, nor has any additional comments on the proposed boundary. The Council has not received any other applications to designate a Neighbourhood Plan that would affect the confirmation of your proposed plan area as set out in Section 61G(10) of the Act. Furthermore, the Council does not consider that the area is wholly or principally an employment area and as such, a Business Area need not be designated under Section 61H of the Act.

Therefore, I can confirm on behalf of Breckland Council under delegated authority that the Neighbourhood Plan area as set out in your submission has been duly confirmed from the date of this letter.

The Council is required to advertise the confirmation of your plan area and place this on its website as required by Regulation 7 of the abovementioned Regulations but this is a procedural requirement and should not affect your plan timetable.

I hope that this is of assistance to you.

Yours sincerely,

Phil Mileham BA (Hons) MA MRTPI Deputy Planning Manager Breckland Council, Norfolk South Holland Council, Lincolnshire

contactus@breckland.gov.uk

Breckland Council Elizabeth House, Walpole Loke, Dereham, Norfolk NR19 1EE Telephone 01362 656970 www.breckland.gov.uk



# Appendix 3

# The Steering Group

# Terms of Reference and Membership

#### Swanton Morley Neighbourhood Plan

### **Steering Group Terms of Reference**

#### Name

The name shall be the Swanton Morley Neighbourhood Plan Steering Group, hereafter referred to as the Neighbourhood Plan Steering Group (NPSG).

#### Purpose

The purpose of the Steering Group shall be to support the Parish Council to carry out the following tasks:

- 1. Investigate and identify support for the Neighbourhood Development Plan.
- 2. Identify sources of funding.
- Take responsibility for planning, budgeting and monitoring expenditure on the Plan and report back to the parish council on these matters.
- Liaise with relevant authorities and organisations to make the Plan as effective as possible.
- Identify ways of involving the whole community and gather the views and opinions of as many groups and organisations in the community as possible.
- 6. Determine the types of survey and information gathering to be used.
- Be responsible for the analysis of the survey, the production and distribution of the final report.
- Identify priorities and timescale for local action in the Implementation Plan, including the lead organisations and potential sources of project funding.
- Report back to the Parish Council on progress, issues arising and outcomes from the exercise.
- 10. Write the Terms of Reference for any Working Groups prior to their establishment.

#### Membership, Roles & Relationships

a. The Steering Group will be made up from a good cross-section of the community, including parish councillors nominated by the parish council. (See Appendix A).

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#### Swanton Morley Neighbourhood Plan

- b. At the first meeting, the Steering Group will elect a chairperson.
- c. The NPSG shall be quorate when a minimum of four members are present.
- d. Parish Council insurance will cover the previously agreed activities of the Steering Group and volunteers, but steering group officers, in liaison with the parish clerk, need to ensure that terms of the insurance are not breached.
- e. The Steering Group, via its parish council members will provide a regular report to the parish council, for endorsement. The parish council will provide the opportunity for the endorsement of regular reports via its meeting agenda.
- f. Working Groups will carry out duties specified by the full Steering Group, which may include:-
  - Data Gathering
  - Consultations
  - Making recommendations
- g. The make-up and purpose of working groups will be regularly reviewed by the full Steering Group.
- h. It is expected that all Steering Group members abide by the principles and practice of the Parish Council Code of Conduct including declarations of interest. Although as a Steering Group which does not make decisions on behalf of the Parish Council, declarations of interests need be provided.
- i. All members of the NPSG must declare any personal interest that may be perceived as being relevant to any decisions or recommendations made by the Group. This may include membership of an organisation, ownership or interest in land or a business or indeed any other matter likely to be relevant to the work undertaken by the NPSG.

#### Meetings

The Steering Group shall normally meet monthly (but every two months as a minimum), or as may be required. All meetings should be held in public and be open to the public.

At least three clear days' notice of meetings shall be sent to members via email. Whenever possible, notices of meetings should detail the matters to be discussed.

The Clerk shall keep a record of meetings, and circulate notes to Steering Group members and the Parish Council in a timely fashion.

It is recommended that an annual rolling schedule of meetings is set in place, preferably at the first meeting of the Steering Group and made available to the public via notice

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#### Swanton Morley Neighbourhood Plan

boards/websites.

Decisions on operational matters (relating to the process of preparing the Plan) shall be determined by a majority of votes of the NPSG members present and voting. In the case of an equal number of votes, the Chairperson shall have a casting vote.

Decisions on matters relating to the proposed content of the Plan shall be made by the full Parish Council, following consideration of recommendations made by the NPSG.

#### Working Groups

- The Steering Group may establish such working groups as it considers necessary to carry out the functions specified by the Steering Group.
- Each working group should have a lead person.

#### Finance

- 1. All grants and funding will be applied for and held by the parish council, who will ring-fence the funds for Neighbourhood Development Plan purposes only.
- Notification of all planned expenditure will be given to the parish council before actual costs are incurred.
- The Parish Clerk shall keep a clear record of expenditure supported by receipted invoices and will regularly review and update the budget
- 4. All expenses occurred by volunteers shall be authorised by the Parish Council. Members of the community who are involved as volunteers with any of the working groups may claim back any previously agreed expenditure that was necessarily incurred during the process of producing the Neighbourhood Development Plan. This could include postage and stationery, telephone calls, travel cost.
- Invoices will be made out in the name of the parish council who will pay them at their next scheduled parish council meeting.

#### Dissolving the Steering Group

 At the conclusion of the Neighbourhood Development Plan project the parish council and Steering Group should discuss the future working of the Steering Group. If the Steering Group wishes to dissolve it must notify the parish council.

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Page 3 of 5

#### Swanton Morley Neighbourhood Plan

#### Changes to the Terms of Reference

These Terms of Reference may be altered and additional clauses added by agreement of the Parish Council.

Signed on behalf of Swanton Morley Parish Council

R. Atterwill

Chairman – Mr R Atterwill

Swanton Morley Parish Council

Date: 12th October 2015

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### Swanton Morley Neighbourhood Plan

#### Appendix A - Steering Group Membership List

Swanton Morley NPSG - membership

- 1. Mr R Atterwill (Chairman)
- 2. Ms y Hendry (Vice-Chairman)
- 3. Mr L Brooks
- 4. Mr G Curran
- 5. Mr J Keith
- 6. Mr G Palmer
- 7. Mr J Rodrigues 8. Mr D Sadler
- 9. Mr S Taylor
- 10. Mr S Westbury

Supported by

11. Mrs F LeBon 12. Mr S Vincent

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# Communication Strategy

### Swanton Morley Neighbourhood Plan

# **Communication Strategy**



#### 1.0 Executive Summary

The production of the Neighbourhood Plan is led by Swanton Morley Parish Council; it is on behalf of the local community and for the current and future communities of Swanton Morley.

It is important that ALL residents of Swanton Morley are given an opportunity to participate in developing the Neighbourhood Plan, shaping its Vision, Aims and Objectives as well as owning the policies that subsequently emerge.

A fundamental component of the Neighbourhood Plan is for the residents, stakeholders and interested parties from the local community of Swanton Morley to engage in and be engaged by the steps undertaken to complete the Neighbourhood Plan.

Ultimately, the Neighbourhood Plan can only be adopted (technical term is 'made') following a local referendum at which more than 50% of those voting vote 'yes'.

The communication methods used to deliver the key messages of the Neighbourhood Plan will help local residents' understanding, see that their views are included so that they can support the overall Plan.

The Communication Strategy will guide those directly (and indirectly) involved in the production of the Neighbourhood Plan to be proactive. To put out clear and consistent messages to explain the journey being undertaken and the decisions being made.

#### 2.0 Communication Action Plans

The Communication Strategy is designed to be a dynamic document. A blueprint for how the Neighbourhood Plan Steering Group (NPSG) develops and delivers its messages.

Communication is important for the Parish Council and the Communication Strategy is facilitated by the NPSG, who have a key role in its delivery and implementation.

Communication Action Plans form part of this Communication Strategy and describe how the highlighted key actions will be developed and delivered. This will enable the Parish Council and NPSG to ensure that the strategy is implemented and that this results in improved levels of understanding and recognition of the Neighbourhood Plan.

Key actions are summarised at Appendix 1

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1

#### 3.0 Target Audience

The primary target audience for messages about the Neighbourhood Plan through the different stages is the residents of Swanton Morley.

There are approximately 2,600 residents within the parish boundary in approximately 900 homes. Different channels of communication are required to ensure ALL our residents (including those difficult to reach) are included; young and old people and those in minority groups.

In addition, there are a number of businesses, schools and clubs that need to be kept informed about the Neighbourhood Plan and given opportunities to have their say.

It will be necessary to ensure Breckland District Council, Norfolk County Council, Government, Statutory Bodies and other stakeholders are also kept informed and consulted.

#### 4.0 What Needs to be Communicated?

The Parish Council and NPSG need to communicate activities relating to the Neighbourhood Plan: -

- what it is doing
- when it is doing it
- how people can engage
- expectations
- timescales involved
- achievements and results

#### 5.0 Plain English

Central and Local Government have a reputation for using jargon and not plain English, especially where planning processes are involved.

It is important we use language that the target audience can understand. Plain English consisting of short well-structured sentences to ensure readability. Where 'jargon' is technically necessary it is to be accompanied with a definition or explanation.

#### 6.0 Methods

As the intention of the Communication Strategy is to be dynamic, this document should be seen as a guide. The communication methods and approaches that it defines are a starting point. As new channels are identified and deemed appropriate they should be pursued and used without delay.

Version 2.0

It is expected that most communication will be written and distributed. Wherever possible modern technologies should be used to support and enhance the messages; such technologies as ......

- Email
- Web updates
- Social Media Twitter, Facebook, StreetLife, etc....

...... may be more successful in targeting specific age profiles and groups.

#### 6.1 Parish Magazine

A wide range of local residents seeking information, updates and local tradesman read the parish magazine, 'Link Up'. It is circulated widely across Swanton Morley each month.

Articles will be placed in each monthly edition giving a high level message and an understanding of what the Neighbourhood Plan is, who is involved, publicising events and workshops, detailing progress, achievements and giving contact details of how to get involved.

#### 6.2 Newsletter

Produced, at key stages, to expand in more detail the articles in Link Up. The newsletters will build a storyboard of the journey taken and activities relating to the production of the Neighbourhood Plan.

#### 6.3 Email

A quick and easy method of getting information delivered instantly to individuals, businesses and stakeholders.

Collection of email addresses should be instigated at the earliest opportunity to maximise the number of contact points and spread of information.

#### 6.4 Website & Social Media

Use of social media to promote and publicise the Neighbourhood Plan and the events associated with it. Utilising the Parish Counci's website with a dedicated page enabling more information to be available on demand.

#### 6.5 Community Workshops & Consultation Events

These events create an opportunity to collect email addresses and to deliver a great deal of information, through display boards, presentations and face-to-face conversations to aid

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a wider understanding of neighbourhood planning in the local community. As well as to test and check back the outcomes and views with stakeholders.

Conversations also provide an opportunity for local residents and stakeholders to question in more detail.

#### 7.0 Consultation

#### 7.1 Local Community

As the Draft Neighbourhood Plan is developed prior to being submitted for examination, it is imperative that the local community is also taken on that journey. Building understanding of the neighbourhood planning activities and ensuring everyone who wants to, has had equal opportunity to have their say.

Key elements of consultation will be: -

- Designation of Neighbourhood Area
- Vision, Aims and Objectives
- Emerging policies
- Draft Neighbourhood Plan

#### 7.2 Stakeholders & Statutory Bodies

In consideration of the wider impact of the Neighbourhood Plan, it is necessary to engage key stakeholders, both from within the local community and the wider area. Such as Local Authorities, Councils and national Statutory Bodies.

#### 8.0 Referendum

Ultimately the Neighbourhood Plan can only be adopted, following a successful outcome at examination. This means achieving a positive outcome - more than 50% of those voting vote 'yes' at the local referendum.

It is fundamental, therefore, that the support of the local community is maintained throughout the process to ensure the content of the Neighbourhood Plan reflects their aspirations for Swanton Morley.

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#### Appendix 1

### Communication Action Plan

Key Action	Reason / Outcome	Timescale
Updates & articles in The Mardler, the Parish Council's Newsletter.	<ul> <li>To provide a 'storyboard' about neighbourhood planning &amp; activities</li> <li>To publicise future events</li> <li>To target every household</li> </ul>	Quarterly
Articles in Parish Magazine, Link Up. Deadline: 20 <sup>th</sup> . Distributed: first week of each month.	<ul> <li>To provide a 'storyboard' about neighbourhood planning &amp; activities</li> <li>To publicise future events</li> <li>To target every household</li> </ul>	Monthly
Parish Council Meetings, Progress Reports & minutes.	<ul> <li>To ensure specific identified needs of the local community are included</li> <li>To target lead body in the process</li> </ul>	Monthly
Steering Group Meetings	<ul> <li>To provide transparency of the choices made</li> <li>Target people who want to get involved</li> <li>Opportunity for local residents to observe &amp; listen</li> </ul>	Monthly
Newsletters	<ul> <li>To impart more detailed information</li> <li>To publicise future events</li> <li>Develop the journey &amp; story in more detail</li> <li>To target every household &amp; business</li> </ul>	At key points throughout the process
Community Workshop Events	<ul> <li>To share information</li> <li>To seek views, thoughts &amp; comments</li> <li>To check back &amp; test outcomes</li> </ul>	At key stages

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	<ul> <li>To seek consensus on outputs &amp; priorities</li> <li>To give opportunity to question &amp; understand</li> <li>Target people who want to get more involved</li> </ul>	
Email Broadcasts	<ul> <li>Easy &amp; cost effective</li> <li>Target those who have asked for updates &amp; information</li> <li>Maintains engagement with community</li> </ul>	Ad hoc
Social Media	<ul> <li>Build wider community engagement</li> <li>Better chance of reaching younger community members</li> <li>Ease &amp; speed of use</li> <li>Spontaneous - messages re-Tweeted</li> </ul>	Ad hoc
Website	<ul> <li>Reference point for all to access, ask questions &amp; share views</li> <li>Place to hold key messages &amp; documents</li> <li>Easy access</li> </ul>	<b>Ongoing</b>
Stakeholder List	<ul> <li>To identify important contributors</li> <li>Ensure opportunity for ALL to have input</li> </ul>	Ongoing
Press Releases	<ul> <li>To inform the wider area of activities</li> <li>Official notices when required</li> </ul>	Ad hoc

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Newsletters and Posters

# SWANTON MORLEY **NEIGHBOURHOOD** PLAN

FUTURE

15.0

Sec. A

Launch - 17 October

This Newsletter is to let you know that your Parish Council has decided to prepare a Neighbourhood Plan & would like your help.

EDITION 1 October 2015

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You are invited to join us to find out more about neighbourhood planning and how to share your thoughts and ideas so that they are used to shape the future of Swanton Morley over the next twenty

HAVE YOUR SAY ...... do not miss out ! Get involved - see how below This is important and is your chance to be heard. Swanton Morley is a great place to live and there are areas that need to be protected by us. There are also things that can be improved and this is a great opportunity to make it happen.

### HOW TO GET INVOLVED ...

27 October 2015 to find out about neighbourhood planning & how it will benefit local mat community Have your say ....

PAS"

Just turn up any time between 10am & 1pm Let us know what you like, dislike & would change (if anything) about Swanton Morley. Group and help shape the future 01 n Morieg. We are looking for people

ho care about 2 Morley, want the best for the future of the area & are prepared to share their steam.

No special skills required ly interested planse email az ....

parishcouncilisseuntan murben.org.nik

vears.

Dates for your diary

See what it is all about.

> 14 November 2015

Help to agree the Vision & Objectives for the Plan.

Same time & location for both

10am antil 1pm The Village Hall Manns Lane Swanton Morley NR20 4NP

> 17 October 2015



What is neighbourhood planning?

Introduced by Government through the Localism Act area where they live & the decisions that affect them

Swanton Morley Nei

Neighbourhood Plan, see may

an official application was whole parish of Swanton

Breckland Council ran

which closed on 2 Jul

Parish has been 'desi

Swanton Morley Parish Council have decided to inc

ieighbourhoo

Area

- Designed to provide a powerful set of tools for requirements when planning permission is granted
- Deciding priorities for the local area and where invest .

#### Benefits the Neighbourhood Plan will bring to Swanton Morley

- · a stronger voice to influence development
- · improve the future design of houses
- · stop Developers making the same mistakes when building houses
- · more funding & community benefits for Swanton Morkey
- · legal document to be used to determine planning applications.

parishcouncillitewantonmorley.org.ak



As local residents, this is your chance to have your say ... ... do not miss out !!

### SWANTON MORLEY NEIGHBOURHOOD PLAN

Welcome to our second newsletter. In this edition you will find details of the Vision and Objectives for the Neighbourhood Plan plus details of proposed devel ats in the area.

Through a series of local community events we have been consulting with residents about what they like best, dialike most about Swanton Morley and what (if anything) needs changing. It was great to see so many people take the time to some along to the exhibitions and to share their views and vision for the future of Seanton Morley.

Concerns have been raised about the scale of development being proposed (see below) and the likely negative impact this will have on community facilities, traffic levels and the ability of the current infrestructure

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to cope. Neighbourhood ۰. Plan is not about stopping houses being built. It is about guiding development by the community ideas and sharing reaching a consensus hode the development and use of land in the Neighbourhood Area.

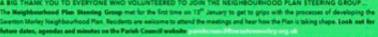
#### SITE ALLOCATIONS

Breckland Council is looking for silles for approximately 150 new houses in and around Swanton Morley.

Come along to the mity event on 15" February to find out ore details and where development sites are ing proposed. This is your chance to

share your views with the Parish Council and have your say where you think the new uses should go.

mant avant Saturday 13th February Swanton Modey Village Hall of them in anythe between 10 & 1pm A BIG THANK YOU TO EVERYONE WHO YOU NTEERED TO JOIN THE NEIGHBOURHOOD PLAN STEERING GROUP



- relat, light industrial & farming activities in & around our village.
  - To develop & Improve local community facilities & services (such as education, medical and recreation) for all age groups.

pative impact (speed, safety and volume) of traffic on all ort enhanced public transport intrastructure. ce the neg our roads & su





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https://www.techosk.com/owertanmarkeusc

https://www.aventonmenicy.org.sk

### Norley Neighbourhood Plan

#### ISION

EDITION 2

January 2016

The state of the s

Neighbourhood

Plan Aims

Column House

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We w

views & hope you can join us at our

VIEWS

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and will continue to be, a hildren to grow up and make real sense of community.

d enhance the history, wironment, attractive outlook unique natural beauty, for all enjoy, whilst embracing a nd sustainable future ce where people ive, work and visit.

#### Objectives

in ongoing basis in the process of plan of development.

& farmland surrounding our village;
 Iand & support nature conservation.

t the village, including the spatial balance svironment, historical assets, character & based on local vernacular styles.

neets the local needs, is affordable & made ton Moriey first.

strategy tailored to the needs & context of elopment is sensitive, in keeping while! decape & built setting.

GRANT FUNDING SUCCESS The Parish Council has secured a grant from Central Government to help with new housing development into the social & Ensuring infrastructure improvements are a, healthcare, Broadband & mobile the cost of developing a

Neighbourhood Plan The grant has been awarded by the Supporting Communities in Neighbourhos Planning ne led by Progra

cally.





infa to

for The themes consultation event 00 18 February have been identified 841-

· Growth · Design

· Transport Please come and share your

- · Environment & Landscape
- · Community facilities · Local Econor ny

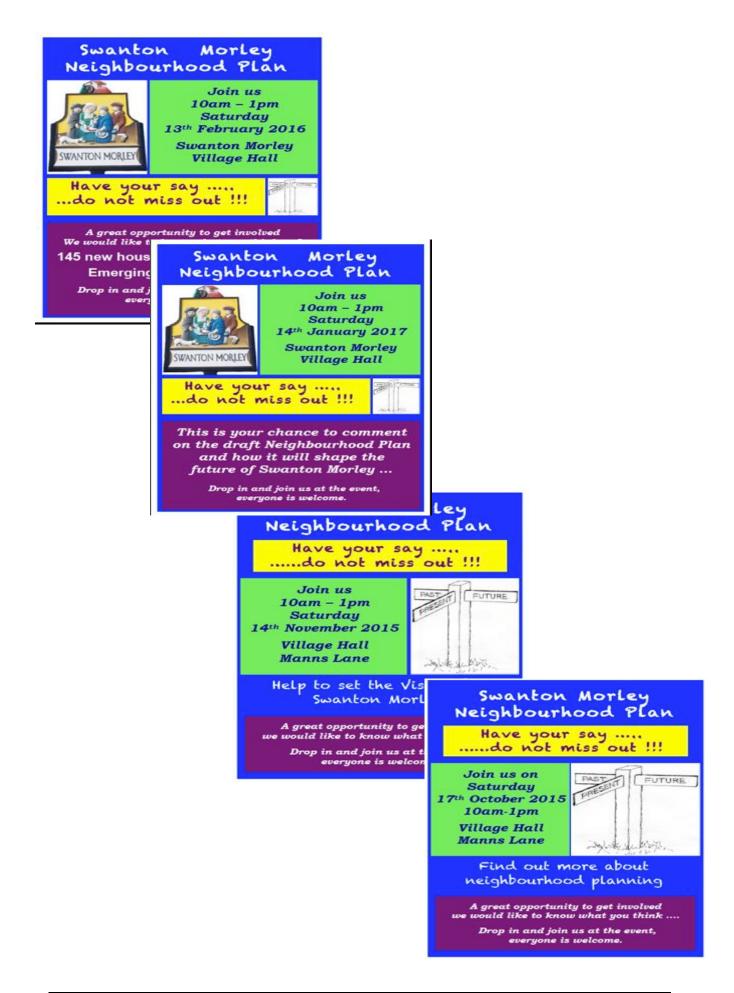
views. We welcome your input on

the emerging policies that will

form the foundation on which the

Neighbourhood Plan will be built.





Parish Magazine & Parish Newsletter Articles



# The Mardler The Newsletter of Swanton Morley Parish Council Thirty First Edition June 2015

Annual Accounts On 8th June, Swanton Morley Parish Council agreed their annual accounts. These cover

the period 1<sup>st</sup> April 2014 to 31<sup>st</sup>

March 2015.

10

been inspected by an internal

suditor, they will now be sent

the council's external

be audited, and all supporting

documents relating to them.

make an appoin 01362 637166.

The period for this exercise of

elector's rights is between 1e

July and 28th July and can be

done by contacting the Clerk to

accounts, or any item within

contacted from 31" July until

the following address:

County Durham

DH1 STS

The Rivergreen Centre Aykley Heads Mazars LLP

Practice.

the conclusion of the audit, at

The auditor can be

Local

auditor. Any person interested

Having already

The Parish Council has agreed to start a Neighbourhood Plan Neighbourhood Diane under brought into bring buy the Long The Parish Council has agreed to start a Neighbourhood Plan. Neighbourhood Plans were brought into being by the localism Act 2011 with the intention of explained communities to plane accurate Neighbourhood Planning Neighbourhood Plans were brought into being by the Localism act 2011, with the intention of enabling communities to play a much remnant rule in shaning the acess in which they live and work and in

unlike the and 3

2011, with the intention of enabling communities to play a much stronger role in shaping the areas in v-kich they live and work and in supporting new development propo supporting new development propo parish, village or town plans that cor neighbourhood plan forms part of alongside the Local Plan prepared Decisions on planning applications Plan and the neighbourhood has the right to inspect and make copies of the accounts to

Neishbourhood planning provid considerations. to set out a positive visi develop until the year 2036 in and make sense for local per policies that will help deliver t for the development they war Swanton Morley Parish Co Neighbourhood Plan. It has which it wishes the Neighb sovernment electors have the the parish of Swanton Mor seek the opinions of the P right to question the external auditor about the accounts and can make objections to the

http://www.breckland.go viewed here: The consultation will ru 4pm on 2nd July 2015. sent to the Planni planningpolicyteam@b address: Planning Pol Walpole Loke, Dereha After this consultatio the application and progress to a full N Planning process, ti have their say, fre public meetings, t This audit is being carried out there will be a re in accordance with the Audit Commission Act 1998, the say on whethe therefore form ( Accounts and Audit (England) We hope that Regulations 2011 and the Audit future develop Commission's Code of Audit

# The Mardler

The Newsletter of Swanton Morley Parish Council Thirty Second Edition Winter 2015

#### Harkers Lane

#### Improvements

As part of the Rectory Road development, the legal agreement states that the developer must pay £10,000 to Norfolk County Council to contribute to a Type 1 surface along Harkers Lane. This is to create a safe route from the new development to the school and village services, avoiding as much vehicular movement as possible. We are pleased to report that the developer paid this money on a timely basis, but despite two attempts, Norfolk County Council has failed to lay the Type 1 surfacing as has been requested by the Planning Authority. To date, Norfolk County Council is insisting that their work is adequate. however the Parish Council continues to argue that the surfacing is not sufficient, will not drain properly, will be lost with increasing movement and is still not in keeping with the legal agreement. The Parish Council expects the Planning Authority (Breckland District Council) to take planning enforcement action if the correct surfacing is not laid. The village can only have confidence in the planning process if the village receives what it has been promised in the Section 106 legal agreement.

**Neighbourhood Planning Update** 

The Parish Council's Neighbourhood Plan is making good progress Two public meetings have been held at Swanton Morley Village Hall, both with good turn outs and attendees being very positive about the village and where improvements can be made. Attendees were

What People Like Most About Swanton Morley 1)Local facilities, amenities and access to open space 2)People, community and village feel 3)No crime

able to see a map of the village showing where areas of land have been put forward for potential development. This map is available to view in the parish office on a Monday between 10am and 2pm when the Clerk is onsite.

Under Breckland District Council's emerging local plan, they would like to allocate a further 145 houses (on top of those that already have planning permission) to the village. The Steering Group will help the Parish Council decide

if this is an appropriate level of development and if so, where is the best place for it what kind of and infrastructure improvements does the village need to support it. Several people have volunteered to become part of the Steering Group to

move the Neighbourhood Plan forward and start developing the planning policies that will apply only to Swanton Morley. The first neeting of the Steering Group will be on 13th January at 7pm at Swanton Morley Village What People Would Change About Hall. There is still Swanton Morley opportunity to join the 1)Traffic (speeding and 'rat-

Steering Group, so if you are passionate about the 2)Affordable housing for local village and would like to shape future help 3)Improve infrastructure (including development, please get in provision for school expansion), touch with the Clerk on Scale of proposed development and 01362 637166. loss of village character

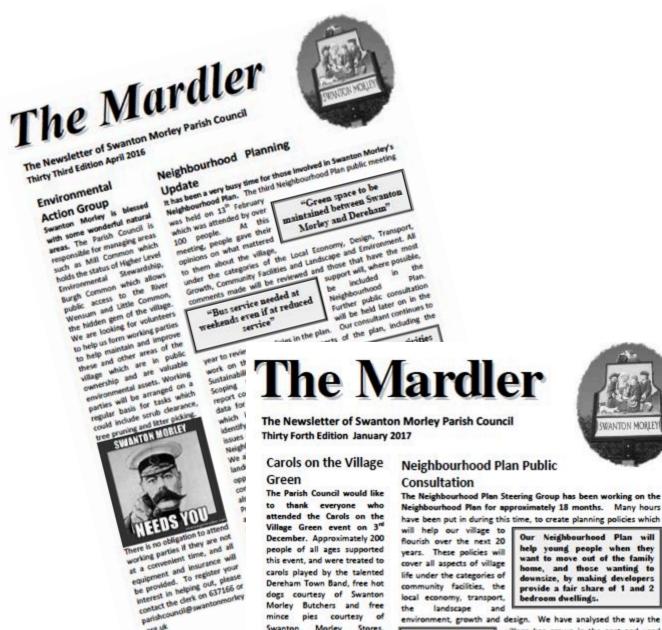
LM Hostead - The Garage Due to their retirement Lindsay and Maureen would like to thank all their loyal customers for their support over the years. We wish Alex, Chris and Vicky all the best at the garage in the future

running')

people

What People Like Least About Swanton Morley 1)Scale of proposed development and loss of village character 2)Infrastructure issues - drainage, no gas, poor Broadband and lack of mobile signal 3)Shortage of affordable houses

Swanton Morley Consultation Statement v1



Swanton Morley Stores.

Youngsters were treated to sweets courtesy of Father Christmas, who was ably

assisted by Dereham Round

Table. All of this was enjoyed

under the Christmas tree,

which was kindly donated by

Bernie Marsham, and the

twinkling lights which adorned

the village green, installed free

of charge thanks to Roger

Atterwill, Feedback from this

event has been very positive

and as a result we will be in

discussions with local village

businesses to repeat the event

next year.

org.uk

landscape the and mince pies courtesy of

> protection for green village.

focussed upon protecting our assets, whilst ensuring the next generation of parishioners has the opportunity to live and work in our village. The next part of the Neighbourhood

Plan is to gain your views on the

environment, growth and design. We have analysed the way the Our Neighbourhood village has grown in the past and used Our Neighbourhood Plan will give extra protection for freen ensure that development mistakes of the protection for green open space in the past are not repeated. We have also ensured that all sectors of our village will

benefit from the Neighbourhood Plan, including those who are not yet old enough to vote. We have

> **Our Neighbourhood Plan** will give Swanton Morley people first choice on new affordable housing in the village.

To do this, a six week consultation period will commence on 12th January 2017 and finish on 24th February 2017. Please make sure that you take part in the consultation, as your views are vital to the way this village grows over the next 20 years.

#### Take Part in the Neighbourhood Plan Consultation

- To have your say on the Neighbourhood Plan, you can either:
- > Pop along to our community event at Swanton Morley Village Hall on Saturday 14th January between 10am and 1pm. OR
- Download\* the Neighbourhood Plan at www.swantonmorley.org.uk and complete the feedback form, returning the form to parishcouncil@swantonmorley.org.uk or post to 9wanton Morley Village Hall, Manns Lane, Swanton Morley, NR20 4NP.

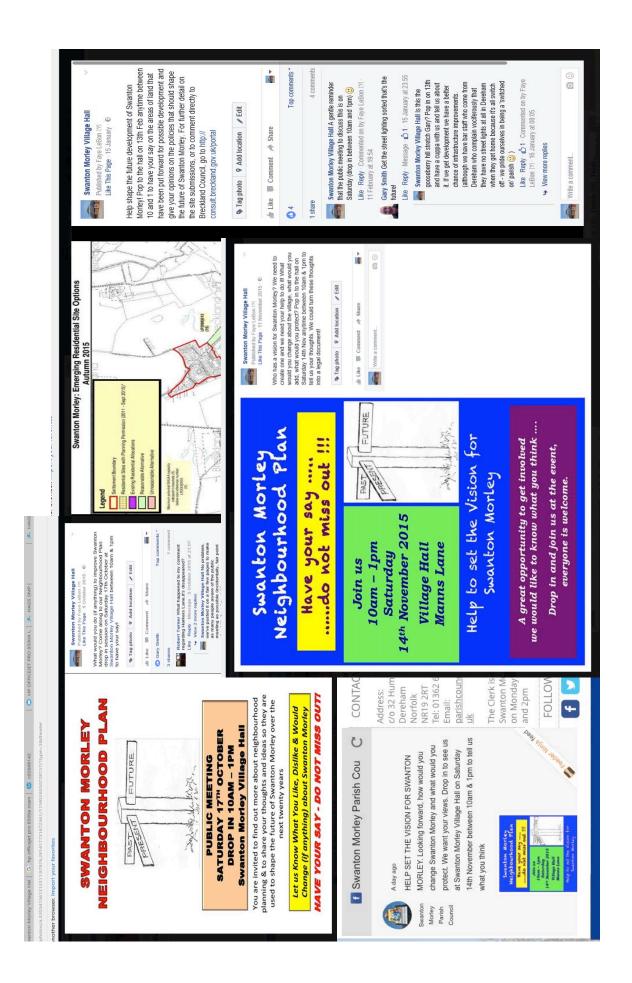
\*Hard copies of the plan can be viewed at 9wanton Morley Village Hall during the hours of 10am -2pm on Monday and Tuesdays. The document can be made available in other formats by request. If you have any queries about the Neighbourhood Plan or the consultation process, please do not hesitate to contact us on 01362 637166.

### Website

Consultant Reports & Steering Group Minutes Report 1 - September 15 Report 2 - October 15	Report 3 - November 15 Report 4 - December 15 Report 5 - January 16 NPSG Minutes January 16 NPSG Minutes February 16 Report 7 - March 2016
SWANTON MORLEY COUNTIE PARISH COUNCIL	<section-header></section-header>

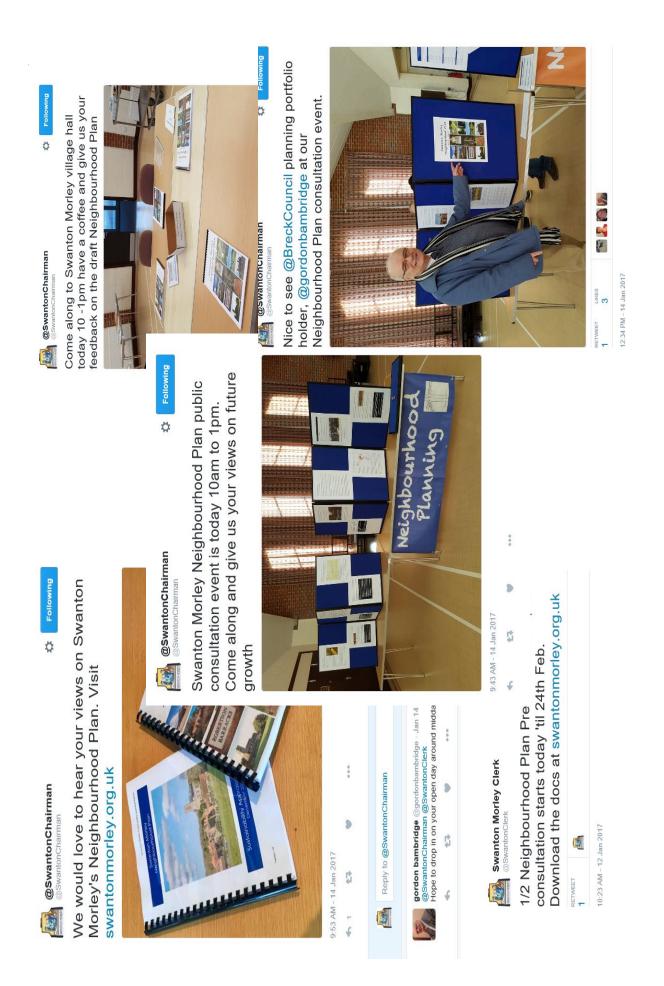


Social Media - Facebook





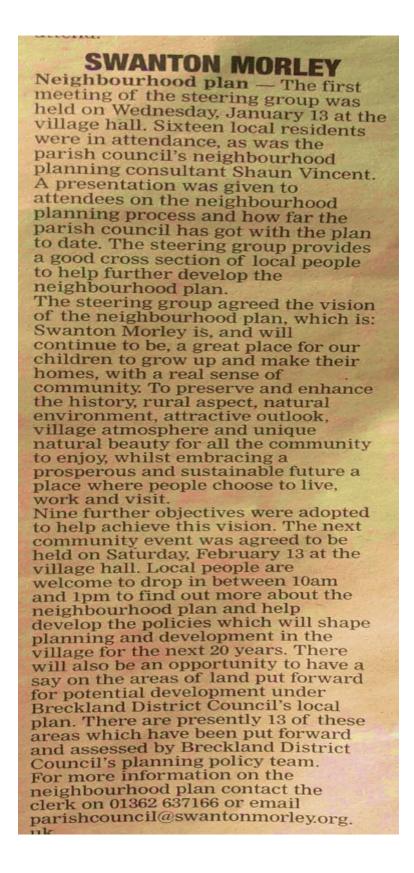
# Social Media - Twitter



### Press Releases in the Dereham Times

- [A] Reporting back on the inaugural Steering Group meeting on 13<sup>th</sup> January 2016 at which the Vision and Objectives for the Neighbourhood Plan were agreed plus details of the next public consultation event on 13<sup>th</sup> February 2016.
- [B] Publicising the start of the 6-week pre-submission consultation on 12<sup>th</sup> January 2017 and details of pre-submission consultation event on 14<sup>th</sup> January 2017 where it will be possible to see and comment on the Neighbourhood Plan and Sustainability Appraisal documents.
- [C] Publicising the 6-week pre-submission consultation and how to see and comment on the documents.
- [D] A reminder of the pre-submission consultation closing date and how to see and comment on the documents.

# [A]



# [B]

# [C]

# PLANNING Neighbourhood plan consultation

A public consultation on a village's neighbourhood plans begins today.

People living in Swanton Morley will have the chance to give their views on the document, which helps influence future development.

The consultation starts on January 12 and runs for six weeks.

To view the plan policies, visit Swanton Morley Village Hall on Saturday, January 14 between 10am and 1pm.

→ SWANTON MORLEY Neighbourhood Plan: The pre-submission public consultation for the plan will commence on Thursday, January 12 and run for a period of six weeks. There will be a drop-in session at the village hall on Saturday between 10am and 1pm to view the plan policies and find out more about how these will shape the village over the next 20 years. These policies will cover all aspects of village life under the categories of community facilities, the local economy, transport, landscape and environment, growth and design. Feedback forms will also be available so residents can give their opinion on the plan. The plan and the feedback forms are also available online at www. swantonmorley.org.uk. Hard copies of the plan can be viewed at the village hall between the hours of 10am and 2pm on Mondays and Tuesdays and 10am and midday on Fridays. The plan is available in other formats upon request. Any questions about the plan can be directed to the parish clerk, Mrs Fave LeBon, by calling 01362 637166 or e-mailing: parishcouncil@ swantonmorley.org.uk. The parish council would like to encourage all residents to take part in the consultation, The closing date for the consultation is February 24.

# [D]

group is well attended, also the ten pin bowling, several members are now meeting for the coffee club every other Tuesday at Weatherspoons. Christine announced the Pedders Way walk will start on Tuesday, February 28. weather permitting , she will be contacting walkers by email. Members were asked to donate some personnel items ie soap shampoo etc will be collected at the April meeting for the women's refuge in Norwich. The next meeting will be held on March 2 when the speaker will be Keith Greentree from Radio Norfolk. visitors welcome £2, meeting starts at 2pm. For further information call 01603 872524.

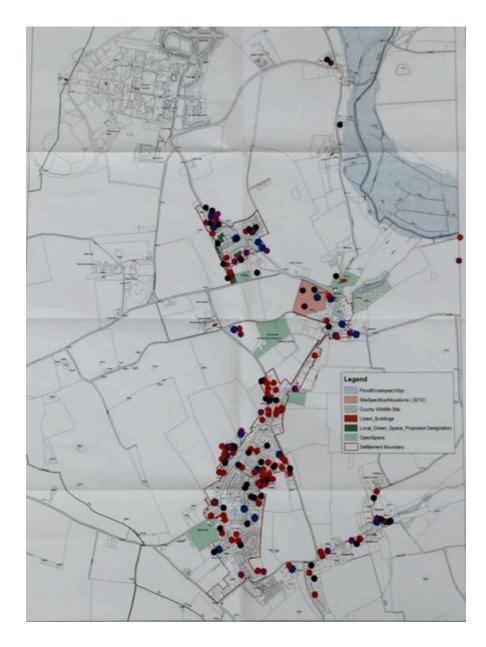
### → SWANTON MORLEY

**Parish council:** The council would like to remind parishioners that the consultation period for the pre-submission neighbourhood plan finishes on February 24. Members of the public are encouraged to make comment on the document and associated sustainability appraisal because, when adopted, they will determine the way the village grows over the next 20 vears. The documents and feedback forms can be found on the parish council's website at www. swantonmorley.org.uk or hard copies can be viewed at the village halll on a Monday and Tuesday between the hours of 10am and 2pm. Any questions about the plan can be directed to the clerk on 01362 637166.

### → WHISSONSETT

Soup: On Wednesday there will be a 'soup, soup beautiful soup at the pop up cafe in the

### 'Dot Map' illustrating attendance at consultation events



coloured dots illustrate attendance at each event;

- Blue launch event in October 2015
- Purple second consultation event
- **Red** third consultation event
- Black 'Pre-submission' event

# Statutory Consultees & Stakeholder Letters

- 4 Invitation to initial Consultation events in 2015 (via email)
- Notification of Pre-submission Consultation (via email)
- Email reminders about Pre-submission Consultation
- Key Consultee List



### **SWANTON MORLEY PARISH COUNCIL**



Parish Clerk: Mrs Faye LeBon 32 Humbletoft Road Dereham, NR19 2RT Tel: 01362 637166 Email: parishcouncil@swantonmorley.org.uk Twitter: @SwantonClerk

11<sup>th</sup> October 2015

Dear Stakeholder

#### **Neighbourhood Plan for Swanton Morley**

We are writing to you to let you know about our progress in developing a Neighbourhood Plan for Swanton Morley.

Hopefully you will have already seen details on our website and social media introducing the neighbourhood planning process and our intent to produce a Neighbourhood Development Plan.

To give you a flavour of what is happening: -

- The Neighbourhood Area has been designated by Breckland Council, this follows our Parish boundary.
- The Department for Communities & Local Government has awarded a grant to the Parish Council towards the cost of this project.
- Members of the local community have responded well to the idea of neighbourhood planning and are keen to become involved.
- We are holding a series of community consultation events that are a great opportunity to share views.

Your views on future development in Swanton Morley are important and welcomed. There are many public open sessions, events and workshops where your participation, views and ideas will help to enhance our village for the whole community.

The next events are on 17<sup>th</sup> October and 14<sup>th</sup> November 2015 both at the Village Hall on Manns Lane, Swanton Morley from 10am until 1pm. We hope you will join us and we look forward to hearing your thoughts.

In the meantime, if you have any comments or would like to know more please respond directly to the above address.

Yours sincerely,

Faye LeBon

Mrs Faye LeBon Clerk to Swanton Morley Parish Council

Page 1 of 1

From: "Swanton Morley Parish Council" <parishcouncil@swantonmorley.org.uk> Subject: Swanton Morley Neighbourhood Plan - Pre-Submission Consultation Date: 9 January 2017 17:49:35 GMT To: <parishcouncil@swantonmorley.org.uk>

Dear Stakeholders,

Please find attached a letter relating to the forthcoming Pre-Submission Consultation for the Swanton Morley Neighbourhood Plan.

Should you have any queries in relation to this consultation, please do not hesitate to contact me.

Kind Regards

Faye LeBon Fda Community Governance Clerk to Swanton Morley Parish Council

Unless expressly stated otherwise, the contents of this e-mail are confidential, represent only the views of the sender expressed only to the intended recipient and are not intended to impose any legal obligation upon Swanton Morley Parish Council. If you are not the intended recipient, you are asked to notify the sender and delete the message as soon as possible.

### SWANTON MORLEY PARISH COUNCIL

Parish Clerk: Mrs Faye LeBon Swanton Morley Village Hall, Manns Lane, Swanton Morley, Dereham, Norfolk, NR20 4NP Email: parishcouncil@swantonmorley.org.uk Twitter: @SwantonClerk



Dear Stakeholder

Neighbourhood Plan for Swanton Morley

We are writing to notify you of the consultation on the 'Pre-submission' draft Swanton Morley Neighbourhood Plan.

The six-week consultation commences on Thursday 12 January and from this date the draft Neighbourhood Plan, Sustainability Appraisal and a response form will be available to download at <a href="http://www.swantonmorley.org.uk">www.swantonmorley.org.uk</a>

We would also like to take this opportunity to invite you to join us at a community event to launch the consultation process. This takes place from 10-1pm on Saturday 14 January at Swanton Morley Village Hall, Manns Lane, Swanton Morley, Norwich, NR20 4NP.

Your views on future development in Swanton Morley are important to us and we would appreciate your participation, views and ideas on the draft Neighbourhood Plan to help us to enhance our village for the community and for future generations to come.

We hope you will be able to attend the event and look forward to receiving your comments on the draft Neighbourhood Plan. If you are unable to attend we would be grateful if you could email your completed response form to: parishcouncil@swantonmorley.org.uk\_no later than 5pm on 24 February 2017.

In the meantime, if you have any questions or would like to know more please respond directly to the above address.

Yours sincerely

Mr Roger Atterwill Chairman, Swanton Morley Parish Council

From: "Swanton Morley Parish Council" >parishcouncil@swantonmorley.org.uk> Subject: FW: Swanton Morley Neighbourhood Plan - Pre-Submission Consultation Date: 12 January 2017 10:39:13 GMT To: <parishcouncil@swantonmorley.org.uk> Dear Stakeholders, A reminder that the Pre-submission consultation for the Swanton Morley Neighbourhood Plan commences today for a period of six weeks. You are welcome to drop into Swanton Morley Village Hall (Manns Lane, Swanton Morley, NR20 4NP) between 10am and 1pm on Saturday 14<sup>th</sup> January to find out more about the plan. The pre-submission version of the plan and sustainability appraisal can be found online at www.swantonmorley.org.uk as can the feedback forms. Should you have any queries about the plan, please do not hesitate to get in touch, either by return of email or on 01362 637166. Kind Regards Faye LeBon Fda Community Governance Clerk to Swanton Morley Parish Council Unless expressly stated otherwise, the contents of this e-mail are confidential, represent only the views of the sender expressed only to the intended recipient and are not intended to impose any legal obligation upon Swanton Morley Parish Council. If you are not the intended recipient, you are asked to notify the sender and delete the message as soon as possible. From: "Swanton Morley Parish Council" <parishcouncil@swantonmorley.org.uk> Subject: Reminder: Swanton Morley Neighbourhood Plan - Pre Submission Consulatation Date: 24 January 2017 10:13:29 GMT To: <parishcouncil@swantonmorley.org.uk> Dear Stakeholders, A reminder that the Pre-submission consultation for the Swanton Morley Neighbourhood Plan commenced on the 12<sup>th</sup> January 2017 for a period of six weeks. We are now 2 weeks into the consultation, which finishes on 24<sup>th</sup> February 2017. The pre-submission version of the plan and sustainability appraisal can be found online at www.swantonmorley.org.uk as can the feedback forms - which can either be emailed or posted back to Swanton Morley Parish Council. Should you have any queries about the plan, please do not hesitate to get in touch, either by return of email or on 01362 637166. Kind Regards Faye LeBon FdA Community Governance Clerk to Swanton Morley Parish Council Unless expressly stated otherwise, the contents of this e-mail are confidential, represent only the views of the sender expressed only to the intended recipient and are not intended to impose any legal obligation upon Swanton Morley Parish Council. If you are not the intended recipient, you are asked to notify the sender and delete the message as soon as possible.

### Key Consultee List

- 1<sup>st</sup> Battalion the Queens Dragoon Guards
- Anglian Water Services Ltd
- British Telecommunications plc.
- Bylaugh Parish Meeting
- Broads Authority
- Capita (lain Withington)
- Cllr Borrett
- CPRE Norfolk
- Breckland District Council
- Broadland District Council
- Dereham Town Council
- Elsing Parish Council
- EDF Energy
- Environment Agency (Eastern Region)
- George Freeman, MP
- Gladstones
- Highways Agency
- Historic England
- Hoe & Worthing Parish Meeting
- Homes & Communities Agency
- Hopkins Homes
- Hutchison 3G UK Limited
- Mobile Operators Association
- National Grid Gas Distribution
- National Grid DPM Consultants
- National Power
- Natural England
- Network Rail
- Norfolk Biodiversity Partnership
- Norfolk Constabulary Estates Dept (HQ)
- Norwich City Council
- Norfolk Clinical Commissioning Group
- Norfolk County Council
- Norfolk Geodiversity Partnership
- Norfolk Landscape Archaeology
   Norfolk Homes Ltd

- North Norfolk District Council
- Norfolk Police Authority
- Norfolk Rivers Internal Drainage
   Board
- Norfolk Wildlife Trust
- O2 (UK) Limited
- Savills Norwich
- South Norfolk Council
- Wherry Housing Association Ltd
- Vodafone Limited

Community Consultation Events Feedback

# Swanton Morley Neighbourhood Development Plan

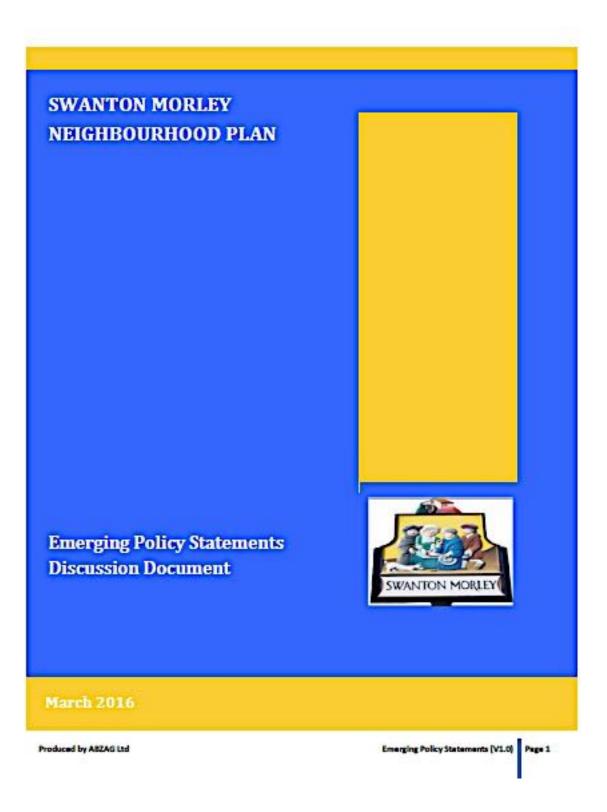
Community Consultation Feedback

No.	Name	Торіс	Response	Neighbourhood Plan Comment & Action
Cl	Lindy Warmer Business Growth Manager, Inward Investment Breckland District Council	Third Consultation Event (Feb'16)	Thank you for the information on your proposed Neighbourhood Development Plan. This is not actually something that economic development would naturally be involved with as its more of a planning issue. In that case I have copied in my colleague Phil Mileham who is Breckland's Strategic Planning Manager. Of course should you feel at any stage that our input with the regard to inward investment or other economic issues would assist then please don't hesitate to contact us. I hope it all goes well for you.	Thank you for letting us know, although disappointing that opportunity will be missed to engage with business community. Thank you for passing on to Strategic Planning Team, although they have already received the notification and invite directly. Proposed action:- No changes proposed to the Neighbourhood Plan.
C2	, D. Jamieson	Third Consultation Event February 2016	Thank you for the very informative morning yesterday. Well done for keeping your cool with the grumpy NIMBY's, they seem to forget that having a thriving village will help to maintain the services they hold dear, such as the school, surgery, shops, pubs and the church. Gordon and I found the session very helpful, and it shows why Swanton Morley is a great village to live in. Please on our thanks to the whole team.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.

C3	Cllr G Bambridge Breckland District Council	Pre-submission consultation event	Attended the consultation launch of the Swanton Morley Neighbourhood Plan yesterday. Well done for the village for getting started on this, and for the quality of all the questions you are asking your residents and others. I did not fill a questionnaire in as that would be quite inappropriate, but I was asked twice, so people on duty were up to the task they had. I now look forward to seeing the plan go through the system over time. A number of communities have decided to along this route, and I hope that many more of our larger and medium size villages will do their	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
			route, and I hope that many more of our larger and medium size villages will do their own plans.	

# Appendix 14

**Emerging Policies – Statement Review** 



# 1.0 Background

The emerging policy statements will be used to develop the planning policies for the Swanton Morley Neighbourhood Plan. The emerging policy statements are comments and statements local residents have said are important and include the initial suggestions from the Steering Group.

To enable us to assess the level of local support, we invited residents to come along to the Emerging Policy Community Workshop event to give us their opinions. At the event on 13<sup>th</sup> February 2016 we asked the local community for their views on a number of 'Emerging Policy' statements put forward by the Steering Group and for any additional suggestions. The results and outcomes of the event are recorded in this document.

The emerging policy statements are grouped by six policy themes:



Residents who attended the consultation event were asked to rate each statement by indicating which of the following best described their views:

- Strongly Agree
- Agree
- Not Sure
- Disagree
- Strongly Disagree

As part of the consultation, residents were also given the opportunity to add additional aspirations or comments which were important to them by writing them on 'post it' notes and adding them to the relevant boards for each theme.



Produced by ABZAG Ltd

### Policy Statements receiving the most favourable support

Of the 41 emerging policy statements that were consulted upon, the seven in Fig.2 received the most favourable support from local residents at the Emerging Policy Community Workshop.

REF.	STATEMENT	% *	0	
C5	Ensure infrastructure expands with new development (school, medical, utilities, drainage)	100%	(* either	
в	Open green spaces should be protected & biodiversity encouraged	100%	Changela	
T1	A Developer must show how new development will not adversely affect traffic on existing roads	100%	Agreed with	
u	More green open space, footpaths & cycleways, which are easily accessed & safe to travel	100%	Statement	
12	New developments should demonstrate how 'open space' areas are to be managed & maintained in a sustainable way			
L4	Footpath to the Church to provide safe access	100%	10 	
D6	New developments designed in a way that encourages cycling and walking	100%	8	

# Policy Statements receiving the least support

Of the 41 emerging policy statements that were consulted upon, the five in Fig.3 received the least support from local residents commenting at the Emerging Policy Community Workshop.

REF.	STATEMENT	* •	
D10	New developments should make provision for 'self-build' plots		(* either
ES	Support more shops to offer greater choice	68%	Strongly
B	Identify a site for small local businesses / light industrial units	51%	<ul> <li>Disagreed of Disagreed</li> </ul>
D12	All new dwellings should have solar panels		with
75	Increase the width of Hoe Road East to at least full single carriageway	40%	Statement)

Produced by ABZAG Ltd

# 3.0 Assessment of Feedback

The emerging policies statements will be developed into the planning policies and are important, as these will be the foundation of the Neighbourhood Plan. The planning policies will be the 'building blocks' to delivering the Plan's Objectives and achieving the Vision for Swanton Morley.



As illustrated in the pictures - by the number of coloured post-it notes - this encouraged plenty of comments and suggestions.

These comments have been added to the original 41 statements for consideration by the Steering Group, and are listed under the relevant policy theme in this discussion document.

As a Steering Group it is important that we now review the comments made, assessing their suitability and level of support when considering which should be developed into planning policies for the Neighbourhood Plan.

The assessment; the suitability (evidence and justification) and the level of support, should be undertaken while being mindful of the Vision:

Swanton Morley is, and will continue to be, a great place for our children to grow up and make their homes, with a real sense of community.

To preserve and enhance the history, rural aspect, natural environment, attractive outlook, village atmosphere and unique natural beauty, for all the community to enjoy, whilst embracing a prosperous and sustainable future as a place where people choose to live, work and visit.

Produced by ASZAG Ltd

and in delivering the Objectives of the Neighbourhood Plan:

- To involve local people in an ongoing basis in the process of plan-making, monitoring & delivery of development.
- To protect the countryside & farmland surrounding our village; promoting green space, woodland & support nature conservation.
- To preserve the character of the village, including the spatial balance between the rural & built environment, historical assets, character & ethos whilst improving design based on local vernacular styles.
- To support new housing that meets the local needs, is affordable & made available to people from Swanton Morley first.
- To support a housing growth strategy tailored to the needs & context of Swanton Morley, where development is sensitive, in keeping whilst protecting & enriching the landscape & built setting.
- To promote the integration of new housing development into the social & physical fabric of the village. Ensuring infrastructure improvements are made to roads, sewage, healthcare, Broadband & mobile communications.
- To enhance the provision of, & protect, the existing small business, retail, light industrial & farming activities in & around our village.
- To develop & improve local community facilities & services (such as education, medical and recreation) for all age groups.
- To reduce the negative impact (speed, safety and volume) of traffic on all our roads & support enhanced public transport infrastructure.



Produced by ABZAG Ltd

# 4.0 Results & Outcomes

The analysis of the feedback is recorded by theme and uses a 'Traffic Light' analysis to graphically illustrate the extent of support shown for each of the 41 emerging policy statements.

# Landscape & Environment

We consulted on seven emerging policy statements under this theme. Each statement and its reference number are listed in the table below:

Ref:	Statement
ц	More green open space, footpaths & cycleways, which are easily accessed & safe to travel.
12	New developments should demonstrate how 'open space' areas are to be managed & maintained in a sustainable way.
B	Open green spaces should be protected & biodiversity encouraged.
L4	Footpath to the Church to provide safe access.
15	Install more litter & dog bins around Swanton Morley.
LG	'Beautiful' walks & views across the countryside should be protected.
L7	Parts of Swanton Morley feel remote & should be better connected by paths & cycleways.

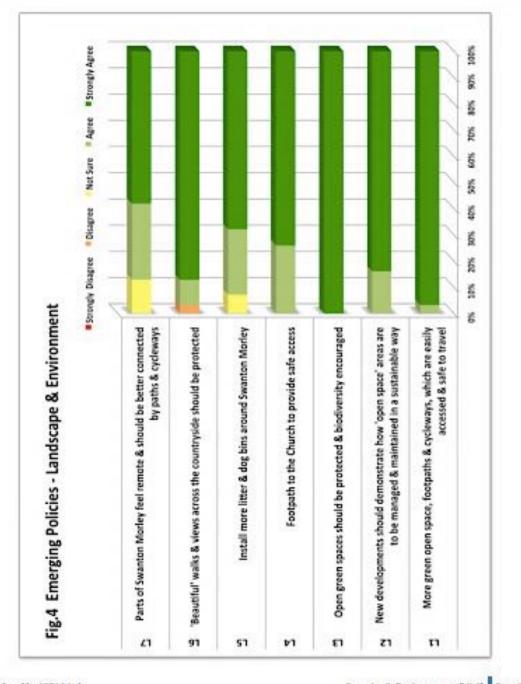
See Fig.4 chart for an analysis of residents' feedback.

Overall, this group of policy statements were received positively at the Emerging Policy Community Workshop with residents either strongly agreeing or agreeing with all except three statements.

Whilst statements L5 and L7 did not receive unanimous support, a number of residents were not sure whether or not they agreed with these statements 7% (for L5) and 13% (for L7).

Statement L6 was the only one in this theme to receive any adverse feedback albeit only 3% of feedback was against.

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# Design

We consulted on twelve emerging policy statements under this theme. Each statement and its reference number are listed in the table below:

Ref:	Statement
D1	More affordable housing specifically for local people and/or first time buyers.
D2	All new houses should have at least two parking spaces, with one space provided for each extra bedroom.
D3	New developments should be of a density 'in keeping' with the surrounding houses to maintain a village feel.
D4	Smaller bungalows or houses for older people (not connected to surgery).
D5	Design layouts to include storage for three wheelie bins for each new home.
D6	New developments designed in a way that encourages cycling and walking.
D7	Parking areas & parking courts should NOT be located behind or away from houses.
DS	New developments should include a mix of housing types & sizes especially suitable for the elderly & young.
D9	Parking should be provided adjacent to, or in front of, all new dwellings.
D10	New developments should make provision for 'self-build' plots.
D11	Build on 'brown field' sites before farmland.
D12	All new dwellings should have solar panels.

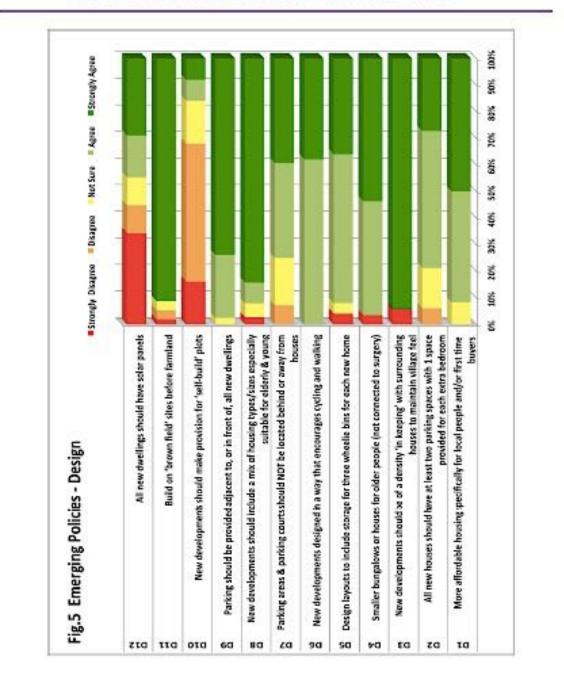
See Fig.5 chart for an analysis of residents' feedback.

The emerging policy statements for Design received a mixed response at the Emerging Policy Community Workshop. On the whole feedback for the Design policy statements was favourable, although three quarters of the statements within this theme received some negative feedback from residents at the Workshop.

Policy statements D10 and D12 received the most adverse feedback:

- D10 in respect of self-build plots received the least support with more than two-thirds of
  residents who expressed a view not supporting this; and
- D12: 45% of residents commenting on this statement either strongly disagreed or disagreed that all new dwellings should have solar panels.

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Emerging Policy Statements (V1.0) Page 11

Swanton Morley Consultation Statement 1

Residents also put forward the following comments and ideas (the words shown are the exact words used) in respect of the Design theme:

#### AFFORDABLE HOUSING

 Affordable housing should not be just for 'local' people. Build relationship with housing associations to provide affordable rent & shared ownership homes

#### PARKING

- In a village all new houses should have 2 parking spaces on drive for safety reasons
- (D2) 3 spaces perhaps with room/garden to create extra parking if required.

#### DESIGN LAYOUTS - ROADS

- Roads to the houses needs to be designed so that you can pass each other & so people working not forced into main roads/nearby street to park
- A poorly conceived hotch potch of a scheme. Will over-tax drainage & traffic movements. IF any building is allowed it should only <u>be after</u> infrastructure improved & <u>in place</u>

#### DESIGN LAYOUTS - BIN STORAGE

 Ideally each new property should have a gated side entrance to accommodate the wheelie bins – as these are unsightly. Where this is not possible (eg. Terraces) black bags should be used.

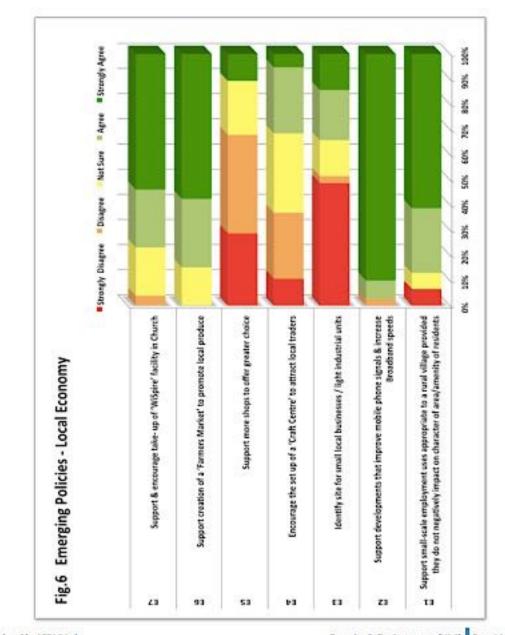
#### PROTECT RURAL FEEL

- Protect hedgerows not to be removed
- Consideration should be given to people's quality of life with so many new houses being imposed in such a lovely rural area

#### **NEED & JUSTIFICATION**

 This is just damage limitation on a done deal ! Why 150 new houses & who are they for & where will these households work?

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# **Community Facilities**

We consulted on seven emerging policy statements under this theme. Each statement and its reference number are listed in the table below:

Ref:	Statement
C1	New development should provide new community facilities & services.
2	More facilities targeted at teenagers - play areas, meeting places etc.
3	Secure some land for school expansion (not the playing fields).
C4	Set up & run a housing trust for rented accommodation in Swanton Morley.
5	Ensure infrastructure expands with new development (school, medical, utilities, drainage).
6	Support provision of new/enhanced bus routes & provide more bus shelters.
7	Improve cycleways & footpaths in & around Swanton Morley.

See Fig.7 chart for an analysis of residents' feedback.

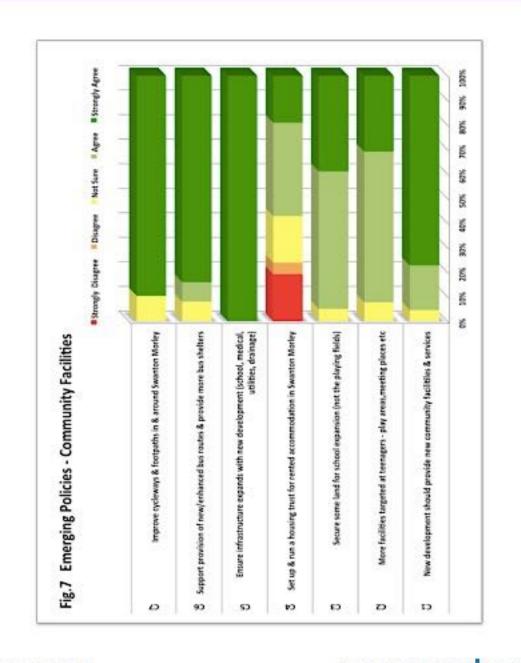
This group of policy statements received the greatest support at the Emerging Policy Community Workshop.

Six of the statements received more than 90% favourable support from the views expressed.

Statement C5 received unanimous support - with all residents expressing a view strongly agreeing with the need to ensure infrastructure expands with new development.

Statement C4 – to set up and run a housing trust - was the only statement in this theme to receive adverse feedback with 24% of residents expressing a view not supporting this. A further 57% gave their support and 19% were not sure.

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# Transport

We consulted on eight emerging policy statements under this theme. Each statement and its reference number are listed in the table below:

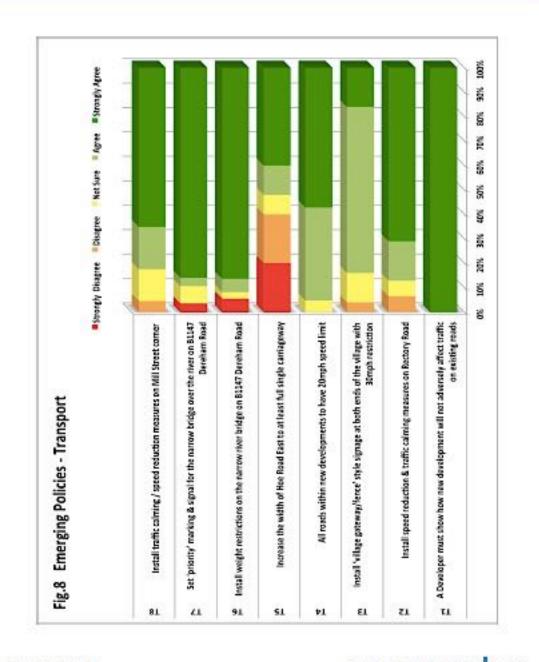
Ref:	Statement
TI	A Developer must show how new development will not adversely affect traffic on existing roads.
T2	Install speed reduction & traffic calming measures on Rectory Road.
T3	Install 'village gateway/fence' style signage at both ends of the village with 30mph restriction.
T4	All roads within new developments to have 20mph speed limit.
T5	Increase the width of Hoe Road East to at least full single carriageway.
T6	Install weight restrictions on the narrow river bridge on B1147 Dereham Road.
77	Set 'priority' marking & signal for the narrow bridge over the river on B1147 Dereham Road.
TB	Install traffic calming / speed reduction measures on Mill Street corner.

See Fig.8 chart for an analysis of residents' feedback.

Only one statement (T1) received unanimous support from residents expressing a view at the Emerging Policy Community Workshop. The other seven statements received a range of responses, although overall these were positively supported with each one receiving in excess of 82% support with the exception of T5

Residents were much less certain about statement T5. Whilst 52% of the feedback received was in support of increasing the width of Hoe Road East to at least a full single carriageway, a further 40% disagreed and 8% were not sure about this.

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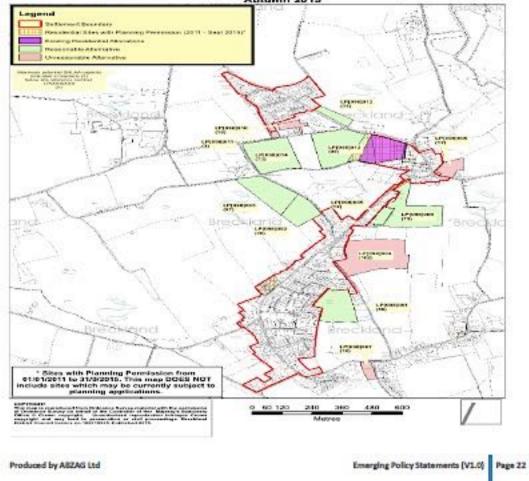


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# Growth

The key focus, relating to Growth, is the housing allocation of c150 dwellings for Swanton Morley through the Local Plan.

Breckland Council issued a Site Allocation consultation document for comments through January and February 2016; this document and the possible sites it contained was used as the basis for collecting local residents views on their preferred locations and why.



Swanton Morley: Emerging Residential Site Options Autumn 2015

At the Emerging Policy Community Workshop on 13<sup>th</sup> February 2016 - alongside the emerging policy theme boards - we also consulted with residents about their views on the Site Allocation options.

Residents were asked whether they did or did not support each of the proposed options and to give their reasons.



This part of the consultation generated a great deal of interest from local residents



See Appendix A for the collected responses.

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Site Ref: LP(098)001 Use: Resid		idential Number of dwellings : 55		
If you SUPPORT this site st	ick a dot below	If you do NOT SUPPORT this site stick a dot below		
2%		98%		
SUPPOR	Please write your reasons on	a 'post-it' note & stick below NOT SUPPORT		
No comments in support		<ul> <li>Access will not support 55 extra buildings</li> <li>Village is already highly built up and populated in this area</li> <li>Extension of existing estates. Too close to existing estate.</li> <li>Are they also proposing to build a motorway?</li> <li>The area behind Bedingfield is not a good one because it would affect so many people (not me) but there are better options.</li> <li>As you drive into Bedingfield Road, the road is too narrow for 2 cars to pass.</li> <li>Access to site narrows at Mason Road / Keith Road – can not support additional traffic conducive with 55 dwellings</li> <li>If you build 55 there could be 100+ extra cars on this road (metric used is multiple of 8, therefore, would generate 440 extra vehicle movements per day)</li> <li>Another 100 cars or so on Woodgate Lane – really I</li> <li>This is a built up area when comparing against other sites</li> <li>Lot of children in this area. Risk of traffic / knocking them over.</li> <li>Need to balance village out</li> <li>Current sewage pipes are barely adequate now</li> <li>As access to site car only come from Bedingfield Road will cause extra parking and access problems outside my house</li> <li>Have lived here 40 years in Harris Road and do not agree with the proposal to build of Bedingfield</li> <li>Drainage is bad enough in this part of the village</li> <li>Concerned about pollution and noise levels</li> </ul>		

Site Ref: LP(098)002	Use: Residential	Number of dwellings : 36		
If you SUPPORT this site stick a	a dot below If y	If you do NOT SUPPORT this site stick a dot below		
22%		78%		
	lease write your reasons on a 'post-it' n			
SUPPORT		NOT SUPPORT		
<ul> <li>Village balance, connects two parts</li> <li>Balances development in the village prospective</li> </ul>	e from geographic esi e from geographic esi	ane of these roads are suitable for any increase in traffic, pecially near the school e they proposing to build a motorway affic ss of rural areas for rambling o much congestion ingerous on school road, too much traffic. inger to children and families on route to school. Kids at hool should be able to be safe when walking to and from hool istruct school gates imoves open view g increase in traffic to Manns Lane. In addition to existing ffic to school and village hall for risk from site		

Site Ref: LP(098)003	Use: Residential	Number of dwellings : 57
If you SUPPORT this site stick	a dot below If	you do NOT SUPPORT this site stick a dot below
43%		57%
SUPPORT	Please write your reasons on a 'post-it	note & stick below NOT SUPPORT
<ul> <li>Balance the development in the vil</li> <li>Close to cemetery, school and villa</li> </ul>	ige hall	'm just glad my kids have left this school ! The traffic was bad before Dangerous on school road Destroys open view Keep the road and area around the school free of housing and more cars. Manns Lane is already used as a 'rat-run' and families should not have to worry

Site Ref: LP(098)004	Use: Residenti	al	Number of dwellings : 102
If you SUPPORT this site stick	a dot below	If you do	NOT SUPPORT this site slick a dot below
8%			92%
	Please write your reasons o	n a 'post-it' note &	
SUPPORT			NOT SUPPORT
4+ entrance road central to village	community	Public fo     Would ef     No safe a     Junction     splay nol     Proposed     Traffic wi	o site very narrow road otpath would be very close to housing fect the sale of my property on Greengate access to Woodgate Lane on to main road not suitable for extra traffic – vision possible d size of site too large !! Ill be horrendous !! nreasonable ! In fact what are we thinking ?

Site Ref: LP(098)005	Use: Residential	Number of dwellings : 12
If you SUPPORT this site sti	ck a dot below	If you do NOT SUPPORT this site stick a dot below
39%		61%
SUPPORT	Please write your reasons on a	'post-it' note & stick below NOT SUPPORT
No comments in support		No comments against

Site Ref: LP(098)006	Use: Residentia	al Number of dwellings : 17	
If you SUPPORT this site st	ick a dot below	If you do NOT SUPPORT this site stick a dot below	
22%		78%	
SUPPOR		n a 'post-it' note & stick below NOT SUPPORT	
No comments in support		<ul> <li>Road narrow</li> <li>Extends village footprint</li> <li>Access to site would make the area even busier on a dangerous corner</li> <li>Low lying land – boggy I</li> <li>Impact on Listed Building</li> </ul>	

Site Ref: LP(098)007	Use: Residentia	d.	Number of dwellings : 10
If you SUPPORT this site stie	ck a dot below	If you do I	NOT SUPPORT this site stick a dot below
14%	b		86%
SUPPORT	Please write your reasons or	a 'post-it' note & s	stick below NOT SUPPORT
Must improve road and track firs	t	<ul> <li>Access ro</li> <li>During he and alway</li> </ul>	happen to the protected trees and hedging III ??

Site Ref: LP(098)009	Use: Residen	tial Number of dwellings : 73
If you SUPPORT this site sti	ck a dot below	If you do NOT SUPPORT this site stick a dot below
52%		48%
SUPPORT		s on a 'post-it' note & stick below NOT SUPPORT
<ul> <li>Joins village development</li> <li>Gives balance</li> <li>Better to keep traffic away from the school</li> </ul>		<ul> <li>This would be okay but half the size</li> <li>Not so far back</li> <li>The far east of this site is too far into the countyside</li> <li>A smaller site at this location would be more suitable</li> </ul>

Site Ref: LP(098)010	Use: Residen	tial Number of dwellings : 10	
If you SUPPORT this site sti	ck a dol below	If you do NOT SUPPORT this site stick a dot below	
48%		52%	
SUPPORT		on a 'post-it' note & stick below NOT SUPPORT	
Only if road can support it		<ul> <li>Access ?</li> <li>Current lane may not be able to support increase in traffic</li> <li>Can not see how cemetery can expand if housing built around this</li> <li>Do <u>not</u> agree to any more building in the village.</li> <li>No proposed site has taken into consideration of the traffic flow on to Gooseberry Hill, Manns Lane or Bedingfield</li> <li>With all the other developments in the village, why build here?</li> <li>Access is an issue to school, cemetery</li> </ul>	

Site Ref: LP(098)011	Use: Residential		Number of dwellings : 3
If you SUPPORT this site stick a do	t below	If you do NOT	SUPPORT this site stick a dot below
29%		71%	
Plea SUPPORT	se write your reasons on	a 'post-it' note & stick b	NOT SUPPORT
SUPPORT  • No comments in support		<ul> <li>Access is an is</li> <li>No room for mo issue</li> <li>Why would this parking issues</li> <li>Next to burial g</li> </ul>	

Site Ref: LP(098)012	Use: Residential	Number of dwellings : 15
If you SUPPORT this site stick	a dot below	If you do NOT SUPPORT this site stick a dot below
47.5%	6	52.5%
	Please write your reasons on a '	post-it' note & stick below
SUPPORT		NOT SUPPORT
<ul> <li>Would balance village</li> <li>Would tidy-up the paving etc and h</li> </ul>	nave street lighting ?	Maintain open view

Site Ref: LP(098)013	Use: Residential	Number of dwellings : 98	
If you SUPPORT this site st	ick a dot below	If you do NOT SUPPORT this site slick a dot below	
79%		21%	
SUPPOR	Please write your reasons on a 'po T	ost-it' note & stick below NOT SUPPORT	
Would balance village out     Expands on existing developme	ent	<ul> <li>Why do we need to "balance" the village ?</li> <li>Rural areas next to the school</li> <li>Loss of beautiful countyside</li> <li>Access issues</li> <li>This has already been passed so our opinion is pointless !</li> <li>This would, with houses already being built be an enormous 'block' of housing</li> </ul>	

Site Ref: LP(098)014	Use: Residentia	Number of dwellings : 73	
If you SUPPORT this site stick	a dot below	If you do NOT SUPPORT this site stick a dot below	
64%		36%	
SUPPORT	Please write your reasons of	a 'post-it' note & stick below NOT SUPPORT	
SUFFORT		NOT SUFFORT	
<ul> <li>Roads here would need improving</li> <li>Balances development geographica</li> <li>This site seems more preferable as</li> <li>There does not seem to be much d</li> <li>It connects two parts of the village</li> </ul>	it creates a balance	<ul> <li>Access to this site is congested at school times, leadone</li> <li>Would like to see all village 'balanced out' and not</li> <li>Also green area where people walk their dogs daily</li> <li>Road as it will not support it</li> <li>This offers a rural location near the school</li> <li>It is widely used for dog walking / rambling (due to Way) and should not be spoilt by a large developm</li> </ul>	top heavy / Wensum

# Appendix 15

Pre-submission Consultation Meeting with Breckland District Council

# SWANTON MORLEY NEIGHBOURHOOD PLAN MEETING

A meeting was held in Swanton Morley Village Hall on Monday 10<sup>th</sup> April 2017 to discuss feedback from Breckland Council regarding the Swanton Morley Neighbourhood Plan, the meeting commenced at 10.15am.

# Present: Mr R. Atterwill (Chairman), Mr S Vincent (Consultant), Mrs S Heinrich (Breckland Council) Mrs F. LeBon (Clerk) and Mrs K Pickard, (Administrator).

**Opening comments;** Mrs S Heinrich introduced herself as the Breckland District Council Neighbourhood Planning Officer, with past experience and knowledge of procedure regarding Neighbourhood Plans from various planning perspectives. Her role is to 'advise and support' parishes in the Breckland District embarking on Neighbourhood Plans.

Mr R Atterwill then provided opening comments regarding Breckland Council's lack of engagement. Despite open invitations to meetings to discuss the plan, Breckland Council has not been in attendance.

Mr R Atterwill then concluded he believed that there was misapprehension on Breckland Council's part with regards to the Neighbourhood plan, and listed three main points of priority.

### Issue one: Local Lettings Policy.

Mr R Atterwill explained the background for the need for a Local Lettings Policy. It was highlighted that there is a need for 17 families in Swanton Morley needing affordable accommodation, as evidenced in Breckland District Council's Housing Needs survey.

This request has previously been discussed and is highlighted in previous minutes (Breckland District Council Planning committee meeting dated 7 July 2014) and following a discussion with Mr Jason Parker (Capita), Mr Duncan Hall (Breckland District Council), Mr Roger Atterwill and Mrs F Lebon on 12 January 2015 to which Breckland Council have stated that a Local Letting Policy was a possibility.

Copies of these minutes have been requested by Mrs S Heinrich, these will be forwarded without the personal information that deems them confidential.

Outcome of this Issue: Mr R Atterwill stated that this policy will not be removed from the Neighbourhood Plan, contrary to Breckland Council's request, and will go to the examiner to decide, Mr R Atterwill is willing to push for this for the families in Swanton Morley.

# Issue 2: Section 106 Agreement (Delivery of Planning obligations)

As far as Mrs S Heinrich is aware, this is a Local Authority Responsibility and it is the 1<sup>st</sup> time that Breckland Council have been made aware of this.

Mr R Atterwill raised the upgrade of Harkers Lane as point of reference, it was raised that Swanton Morley Parish Council was excluded from the draft of Section 106 agreement and only saw this document when it was completed and signed. Evidence was provided as to the cost to the taxpayer for Breckland District Council's error in this s106 agreement, a cost that would have been avoided should Breckland District Council had consulted the Parish Council on this agreement. Swanton Morley Parish Council had requested sight of this document since September 2014 but had not received the document until it was too late to comment on it.

This policy will remain in the plan and will be sent to the Examiner to see if it will stand.

# Issue 3: Green Open Space

Two out of three areas of Local Green Space designations were agreed by Breckland District Council however the third (Middleton Avenue) was not. Breckland District Council had proposed alternative sites for local green space, but these were not of any great quality and did not comply with the National Planning Policy Framework's definition of Local Green Space. These definitions were read out by Mrs LeBon who further advised that the site on Middleton Avenue did comply with the government's definition.

Feedback from Mrs S Heinrich is that the area on Middleton Avenue is under review.

There was a discussion that Breckland Council was trying to remove Middleton Avenue for non-planning reasons, Mrs S Heinrich is going to go back and research the issue.

Mr Atterwill advised that there had been a previous discussion with Mr Ralph Burton (Breckland District Council) in December 2015 regarding all Breckland owned areas of land in the Middle Camp area, who clarified they are taking a holistic approach to the plan for these lands, but has not once advised what these plans were. Mrs S Heinrich will go back and look into this to clarify the issue.

There is a clear want for this policy so it will remain in the plan and be sent to the examiner.

### Feedback from Mrs S Heinrich:

Mrs S Heinrich highlighted an issue with Policy 5 – Exception Sites.

Mrs Heinrich advised that Breckland District Council was concerned that the Parish Council would have the power of veto for an exception site in the way it is currently worded.

It was advised that the policy is worded to give evidence of community support by the Parish Council, the elected body to represent the village. Community support is deemed necessary for some types of development, as noted in Breckland District Council's proposed policy PD05b in the Local Plan. This requires community support for the policy to be adhered to, and Parish Council support gives a mechanism for this.

Mrs S Heinrich briefly went through the process of feedback and reports, a question was raised by Mr S Vincent regarding obtaining a list of examiners, it was clarified that Swanton Morley Parish Council will be included in the decision of the selection of examiner.

Mrs S Heinrich further stated with this process that she needed to look through (1) The Basic Condition document, (2) The Consultation statement and (3) The Plan document. This was clarified that each document would take a week to review, dependent on workload.

Mrs S Heinrich was clear that the reason for this process would be to avoid potential issues that could delay the Planning.

# **General Points:**

It was also clarified that Breckland Council had delayed in posting someone in to assist with the Input for the Neighbourhood Plan.

Mr R Atterwill has stated there were clear red lines within the Swanton Morley Neighbourhood Plan that the public have shown support for, and the Parish Council will push for.

It was noted that Swanton Morley was the only Town or Parish that said "housing allocation wasn't enough"

Swanton Morley would like sufficient affordable homes for local people to retain the residents in the village, proactive planning possibilities.

It has been requested that Swanton Morley Parish Council would like to obtain feedback from the annual statement, on how effective the affordable housing policy is when adopted. This is important for the monitoring part of the Neighbourhood Plan.

Mrs Heinrich stated that she is comfortable with the neutral approach and will assist with the plan, where there are possible concerns Mrs Heinrich has accepted and understands where red lines are and is looking to how we can move forward.

The Yaxham examiner's report was highlighted in the discussion, Mrs Heinrich will forward this to Mr S Vincent as a reference.

A general point that was raised by Mrs S Heinrich was that terminology needs to read correctly.

Mr S Vincent raised a question to Mrs Heinrich regarding the timescale and date structure of the document, where there appeared to be confusion with dates, 2017-2037 being a 20 year period. This is being taken away for discussion by Mrs Heinrich.

# Way forward

Mrs S Heinrich is to go back and have a meeting with colleagues to see a way forward and provide feedback on points raised.

It has been requested that there is a 'position statement' from Breckland District Council available for the Steering Group meeting on Thursday 13<sup>th</sup> April 2017.

Moving forward with the plan, it may be that the Examiner will have to make the final decisions.

There will possibly be a time management issue with how many projects are active compared to the timescale of the plan. Mr R Atterwill has stated he is more than happy to approach for a helping hand to assist with the project.

Mrs S Heinrich has also requested the timeline to be sent through to her for clarification – Mr S Vincent will send this via email.

Mr R Atterwill stated that Swanton Morley Parish Council is looking for a referendum to be held in September

The meeting closed at 11.35am

# Appendix 16

Pre-submission Consultation Responses

# Swanton Morley Neighbourhood Plan

Pre-Submission Consultation: Responses and Feedback

Period: 12 January to 24 February 2017

Note: Each response received has been recorded in the 'Response' column exactly using the words and spelling used in the response.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
1	R. Atterwill Primrose Square Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. <b>Proposed action:- No changes proposed to</b> <b>the Neighbourhood Plan.</b>
2	P. Reed Greengate Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal. Very good suggestions and agree with the proposals.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
3	M. Woolloy Liberator Close Swanton Morley		Neither agreed nor disagreed with any of the policies or the Sustainability Appraisal.	Thank you for attending the consultation event on 12 January 2017. Proposed action:- No changes proposed to the Neighbourhood Plan.
4	S. Brock Dennis Close Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
5	L. Bevors Keith Road		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support.
	Swanton Morley NR20 4NQ			Proposed action:- No changes proposed to the Neighbourhood Plan.
6	G Curran Keith Road		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support
	Swanton Morley			Proposed action:- No changes proposed to the Neighbourhood Plan.
7	L. Cobham Mill Street Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support and comments.
	· · · · · · · · · · · · · · · · · · ·	Policy 4	Affordable housing should mean affordable today but also affordable to live in – as in Passiv houses.	Comments noted. The cost of housing continues to outstrip earnings for most people; this is not just an issue for Swanton Morley but also for most areas of the UK.
				Passivhaus houses are good as they are a low-energy construction standard and works on the principle of a 'fabric first' approach. The core focus is to reduce the running costs of the house through the space heating and cooling requirements whilst creating excellent indoor air quality and comfort levels. The down side, currently, is they cost more to build which then impacts on 'affordability'.
		Policy 5	No building near the river.	Comments noted. It is extremely unlikely that an 'exception site' would be proposed near the river and even more unlikely that the Swanton Morley Parish Council would give it

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				their support.
		Policy 14	There was considerable flooding, in the village, from the new housing estate building.	Comments noted. This Policy seeks to stop that mistake from being repeated.
		Policy 17	The village will need a larger school & another or larger Doctors surgery for the extra people.	Comments noted.
		Policy 19	We need a speed limit through Mill Street & assess the effect on the 2 bridges.	Comments noted. These could be elements that are addressed through the assessment and, if necessary, mitigation measures.
		Other comments	I strongly feel that we should have a small hydroelectric scheme on the site of the old paper mill to power the village.	Comments noted.
		Sustainability Appraisal	The water in the aquifers and the river must be protected.	Comments noted.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
8	T. Hart Manns Lane		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support.
	Swanton Morley			Proposed action:- No changes proposed to the Neighbourhood Plan.
9	M. Hart Manns Lane Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
10	S. Taylor Liberator Close Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
11	V. Piffero Ward Crescent Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support.
	NR20 4PH	Policy 4	One of the most important.	Comment noted. This Policy has received a great deal of support and has the potential to make a real difference to the future community of Swanton Morley.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
12	H & A Maine Whiteside Mews Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support.
		Policy 1	A village is a village, keep it that way.	Comment noted.
		Policy 2	There must be allowance for village people to rent/buy affordable.	Comment noted. Your concern has been recognised and Policy 4 seeks to see a number of the affordable houses being made available for people with a 'local connection'.
		Policy 3	Developers need to input more to village, ie. improve school and amenities.	Comments noted.
		Policy 4	Definitely, young people need help.	Comment noted.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Policy 5 & 6	Parish Council should have a say in decisions.	Comment noted.
		Policies 7,8 & 9	Maybe give the residents around the green spaces the right to maintain it, ie. Davidson Park, residents look after.	Comments noted.
		Policy 10	Definitely, that's why people live here.	Comment noted.
		Policy 13	More spaces required, average of 2 cars per family.	Comment noted. There is a balance between providing enough off-road parking, to discourage pavement parking, and the need to break the dependency on cars through more sustainable transport modes; such as a better bus service.
		Policy 14	Good drainage required.	Comment noted.
		Policy 15	Need for one bed homes, for new buyers.	Comment noted. It is important for a vibrant community to have a balance of housing types whilst seeking to address local needs.
		Policy 18	Gym equipment on playing fields.	Comment noted.
		Policy 19	Its always been a rat run for people getting from Fakenham Rd to Dereham. Speed reductions measures required.	Comments noted.
			·	Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
13	J. Allinson Hilton Road Swanton Morley		Agree with policies 1-14 & 16-19 and the Sustainability Appraisal. Disagree with Policy 15.	Thank you for your support and your comments.
		Policy 1	As long as <u>some</u> green spaces within the village are also preserved eg. playing fields, village green & middle camp.	Comments noted.
		Policy 13	Planners need to be aware that parking space provision doesn't take away from green areas within the development and that adequate drainage is provided to cope with run off from extra tarmac/paved areas.	Comments noted.
		Policy 14	See comments on policy 13.	Comments noted.
		Policy 15	Feel the % of 1 & 2 bedroom dwellings should be higher.	Comment noted. It is important for a vibrant community to have a balance of housing types whilst seeking to address local needs.
		Policy 19	Independent studies need to be made.	Comment noted and this reflects the need for proper assessment and mitigation.
		Other comments.	Overall I feel the plan is appropriate and supportive of the development of the village whilst keeping the essential essence of the village.	Comments noted and thank you for being positive about development and growth while maintaining what is important to us all.
				Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
14	R & J Bosch Woodgate Swanton Morley NR20 4NU		Agree with policies 1-12 & 14-19 and the Sustainability Appraisal. Disagree with Policy 13.	Thank you for your support and your comments.
			Many thanks for organising the consultation event at the village hall yesterday, and for all the hard work that has gone into the draft Neighbourhood Plan. Feedback form is attached. Would be delighted to see next steps in terms of responding to the feedback you get. Thanks.	It was good to see you at the event and we are pleased to hear you found it both useful and informative.
		Policy 1	Yes, but I'd like to see something in there about the need for Woodgate to retain its 'hamlet' feel, separate from the main village and not permitting future development to join the 2 together (much in the same way as people feel about Swanton Morley and Dereham being joined together). It did have planning protection in the past which I don't think is in the NP. In particular to have LP(098)007 protected from any future development.	Comments noted. Woodgate has a degree of protection, as it is outside the defined settlement boundary. The site LP(098)007 has been classified by Breckland District Council as note suitable and at the community event 86% of residents did not support this site.
		Policy 2	Yes, although I wonder if we should have consulted further on LP(098)016 as being more preferable to LP(098)003 or LP(098)002. There wasn't the opportunity to state this as a preference, as it came forward after the initial village consultation took place.	Comments noted.
		Policy 3	Yes, But I have real concerns about the	Comments noted. By improving road safety

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			encouragement of people to make short journeys by car by making it easier to park, with the rise in childhood obesity, disconnection from the outdoors, use of finite resources (petrol) etc. We should put some resources into doing a survey of all those cars pictured at the school gate and see how far people are driving.	and making the area around the school less dominated by cars it is felt that more parents will choose to allow their children to walk or cycle to school.
			If we really have to create a drop off car park (accepting that at some point in the future it may need enlarging over and over), then let's couple it with a cycle to school scheme and an active campaign to get people to walk or bike if they live less than a mile from the school. With the right pavements and dedicated cycle routes, it should be possible for kids of all ages to cycle to school.	Comments noted. Getting the children to walk or cycle to school has a whole host of benefits for health and the environment. There is also a need to recognise that parents work hard and may have a need to drop off and/or pick up from school on route to work.
		Policy 5	Yes, but a) should clarify that a decision should only be taken by the Parish Council where a publicized opportunity for residents to comment has also taken place.	Comments noted. Swanton Morley Parish Council has a good record for community engagement and involvement; with such am important decision residents would have the opportunity to share their views with the Parish Council.
		Policy 9	Yes, but is 10 years too long? It would be lovely to have, but are we making it too difficult for popular developers like Hopkins to choose to develop here because of the more onerous planning conditions? Just	Comments noted. It is important that sufficient funding is provided to enable the long-term management of any Open Space without the cost just being added to the parish precept and increasing council tax.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			wonder if financing for 5 years post- completion with proper plan for handover is more realistic.	
		Policy 10	Yes, but again, we need to be encouraging more cycling and walking, particularly to school/ pubs/ shops etc.	Comments noted.
		Policy 12	Yes. Would like to see even more emphasis on heating via renewable energy for all new houses and preference being given to developers who use proven 'green' building methods. Let's be bold!	Comments noted. There is a balance to what can be insisted upon without it being too onerous on a developer and being justified for Swanton Morley.
		Policy 13	No. I'm not sure about all of this to be honest. Again, I have concerns that we're still encouraging multiple car ownership rather than putting some resources into getting public transport improved. I agree that on-road parking is unsightly and dangerous, but what can we do to change the fact that everyone over 17 in the household needs to have a car? It just isn't realistic to use the current bus service to get to work, how can we influence this? What about looking into setting up a Car Club or car share/pool scheme in the village so that we use less fuel, less emissions and actually get to know each other?! And make it financially beneficial so that not every household wants more than 1 car? How are we playing our collective part to get	Comments noted. Until public transport improves and is seen as the preferred mode of transport there is a need to deal with the reality that most residents in Swanton Morley have a dependency on the car. This Policy is seeking to address the issue of pavement parking by requiring more off road parking on new developments.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			vehicles off the roads?	
		Policy 15	Yes. But is it realistic that developers will sell 1-2 bed homes at below market value? Only if the rest of the development is financially attractive.	Comments noted. This Policy is about providing the appropriate mix of housing and does not make developers sell houses below the market value. Most developers will seek to maximise their profit for their shareholder by building house types that have the highest profit margin and selling these houses for as much as the market will allow.
		Policy 16	Can we clarify that the community will be consulted where important views or landscape will be altered detrimentally by technological improvements? So, wouldn't want to see improved internet/phone access given precedence to important views and a mast on the banks of the Wensum!	Comments noted.
		Policy 17	Yes. But with the caveat that I don't think the village can support 2 general stores with a large range of supermarkets only 2 miles away. Competition is healthy, but if it leads to closure of one of the shops then having an empty unit will really put other businesses off coming. Before planning consent is granted for such a development, we need to ask the community what types of shops they'd use, and we should see a business plan from potential tenants if the development does go ahead. I'd also like	Comments noted. The creation of local employment and more opportunity for community interaction will support a sustainable, diverse and vibrant village of Swanton Morley.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			to see them in the centre of the village to encourage community interaction, not a row of shops on the outskirts of the village that people will have to drive to.	
		Policy 18	Yes. But I don't like the 'especially parking near the school' bit for reasons stated earlier. Do we really want more and more parents driving their kids to school by making it easier for them, or should we have a policy that encourages cycling/walking – e.g. have a permit scheme where the car park can only be used by those people having to travel more than a mile from home to school?	Comments noted. See earlier responses to your comments.
		Overall, do you agree with the Neighbourhood Plan ?	Overall yes, but with reservations linked to comments above. We do need to be careful not to encourage NIMBY-ism and make the emphasis so much on local people that people of other counties/nationalities (with all the skills and new ideas they bring) are discouraged or prevented from coming. Diversity is something to celebrate as long as the emphasis is on integration and I'd hate the village to become too inward-looking or full of people from a limited number of backgrounds. I think you've got the percentages about right though.	Comments noted. The Swanton Morley Neighbourhood Plan seeks to be positive and balanced about growth, development and achieving the Vision for Swanton Morley.
			There has been a lot of hard work put into	Comment noted.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			this for the benefit of the community, thank you!	Proposed action:- No changes proposed to the Neighbourhood Plan.
15	B. Crockett Bedingfield Rd Swanton Morley NR20 4NT		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
16	M. Crockett Bedingfield Rd Swanton Morley NR20 4NT		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
17	D & K. Purchase Milton Road Swanton Morley		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. <b>Proposed action:- No changes proposed to</b> <b>the Neighbourhood Plan.</b>
18	M. Pryce-Mayer Woodgate Lane Swanton Morley NR20 4NS		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. <b>Proposed action:- No changes proposed to</b> <b>the Neighbourhood Plan.</b>
19	Z. Pryce-Mayer Woodgate Lane Swanton Morley NR20 4NS		Agree with all 19 policies and the Sustainability Appraisal.	Thank you for your support. <b>Proposed action:- No changes proposed to</b> <b>the Neighbourhood Plan.</b>

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
20	P. McCarthy Woodgate Swanton Morley NR20 4NU		Agree with 18 policies and the Sustainability Appraisal. Policy 10 – "no view either way."	Thank you for your support and your comments.
		Policy 12	With the proviso that subsection 10 isn't used as a back door to convert agricultural land into solar farms.	Comment noted. Element (10) of Policy 12 is encouraging renewable energy to be used as part of new houses built on new developments and not about putting solar farms in the countryside.
		Policy 16	Could it not be a requirement on all new developments to facilitate fibre links to each dwelling via a new local cabinet on the site with a new fibre link from that cabinet to the local exchange such that when the exchange is upgraded these dwellings have instant access to the new bandwidth?	Comments noted.
		Overall, do you agree with the Neighbourhood	Yes. Excellent piece of work.	Comment noted.
		Plan ?		Proposed action:- No changes proposed to the Neighbourhood Plan.
21	S. O'Dowd Worthing Road Swanton Morley		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support.
	NR20 4QD	Policy 1	Ambitious; Dereham is very close to the southern edge of Swanton Morley.	Comment noted.
		Policy 3	New development must bring advantages to the community.	Comment noted. The two sites listed in Policy 3 have the potential to deliver benefits for the

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				whole community.
		Policy 4	Affordable properties must take president over large "executive" homes.	Comments noted. All developments are likely to be a balance to meet local needs and the commercial requirements of the developer.
		Policy 7	Essential	Comment noted.
		Policy 8	Essential	Comment noted.
		Policy 9	Essential	Comment noted.
		Policy 11	Essential	Comment noted.
		Policy 13	Essential	Comment noted.
		Policy 14	Essential	Comment noted.
		Policy 15	Essential	Comment noted.
		Policy 16	Essential	Comment noted.
		Policy 17	Essential	Comment noted.
		Policy 19	Speed humps and chicanes do not reduce overall speeds. These can encourage acceleration and greater speed between the installations.	Comment noted.
		Overall, do you agree with the Neighbourhood	The plan is comprehensive and I can only hope that development takes heed of the content.	Comment noted.  Proposed action:- No changes proposed to

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Plan ?		the Neighbourhood Plan.
22	J. Stone Woodgate Swanton Morley		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support.
	, NR20 4NU		Attached is my response to the Neighbourhood Plan. I think you have all done a fantastic job with the plan - it is most impressive!	Comment noted.
		Policy 1	Swanton Morley is a straggling village and any development needs to concentrate on keeping it together.	Comments noted. Hence Policy 2 is supporting the allocated sites that will help to join up Swanton Morley.
		Policy 2	I agree with the proposed sites. If family housing is proposed it is desirable for it be within easy walking distance of the school.	Comment noted and with the provision of suitable footpaths and cycleways this will be encouraged and facilitated.
		Policy 3	I strongly agree with this, particularly parking outside the school, which has always been potentially dangerous.	Comment noted. It is imported to improve road safety, especially where children are likely to be.
		Policy 4	I strongly agree with this. Affordable housing is desperately needed, particularly for the young.	Comment noted and this Policy will bring affordable housing to people local to Swanton Morley.
		Policy 5	l agree – see comment on Policy 4.	Comment noted.
		Policy 6	I think this is essential as all too often in the past Breckland Council has overruled the	Comment noted. Breckland District Council works hard to deliver community benefits

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			wishes of local people.	through planning gain; with the additional involvement of the Swanton Morley Parish Council it is hoped more can be achieved.
		Policy 7	We need local open spaces for children to play.	Comments noted. These spaces are important for the health and wellbeing of the community.
		Policy 8	Provided Swanton Morley Parish Council makes the decision!	Comments noted. Although the decision is not one the Swanton Morley Parish Council can make; it is a decision made by Breckland District Council as the Local Planning Authority. Policy 8 requires that the benefits are quantified and demonstrated.
		Policy 11	Particularly pathways which would help children walk to school.	Comment noted.
		Policy 12	This all sounds just what we want. When I objected recently to the high density of 3 houses on a small site in Woodgate, the answer I got from Breckland was that it was appropriate for such an 'urban area'!!	Comment noted. Policy 12 will improve the design of new housing and how it integrates into the existing built environment.
		Policy 14	I agree very strongly with this, having had 6" of water (mixed with sewage) all round my bungalow in June 2017. Was this caused by the additional development at Woodgate Park?	Comments noted. It is disappointing to hear of the problem recent new development has caused.
		Policy 15	We have far too many 5-bed 'executive' houses being built.	Comments noted.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Policy 16	If people cannot access the superfast broadband, there is the option of WiSpire from the church tower, which offers packages of between 6 – 30Mb. Anyone subscribing will also be contributing to the upkeep of the church as WiSpire gives a small % to the church. We have been exploring the option of a mobile mast on the tower to improve mobile connection, but have not been successful – presumably there are not enough people in the area to make it worthwhile.	Comments noted. WiSpire is a useful alternative to the usual providers and it helps with the church costs.
		Policy 18	Essential for a growing community.	Comments noted.
		Overall, do you agree with the Neighbourhood Plan ?	Sewage capacity has not been mentioned. This is of great concern, particularly in Woodgate. During the flash flooding in June 2017, I was assured that both pumps in the pumping station on Frog's Hall Lane were working throughout. Yet I had to lift the manhole cover on my patio as the water level in the toilets was rising. Sewage poured out and by 11pm that evening the manhole cover was still full to the top. By the following morning it had drained away. I am very concerned that any further development in the village should be matched by increased	Comments noted. Anglian Water has also raised concern relating to capacity and its assessment by new development. This will be added to the criteria of Policy 12.
			foul water capacity.	Proposed action:- No changes proposed to the Neighbourhood Plan.

Swanton Morley Neighbourhood Plan – Consultation Statement

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
23	G. & D. Jamieson Greengate Swanton Morley NR20 4ND		Agree with all 19 policies Sustainability Appraisal - Have not read this in detail to comment.	Thank you for your support and your comments.
		Policy 3	Need to make sure any hedging/landscaping is explicitly included in the planning permission conditions, unlike what happened at Liberator Close where the developer made all sorts of promises but managed to walk away from long term obligations.	Comments noted. Landscaping plans are usually required to accompany or to a condition of a planning application although it is always important to check the any developer puts in those plans exactly what they have said they will do.
		Policy 9	Need to be built into planning consent, see 3 above.	Comments noted. A developer will identify which one of the three options they will use to manage Open Space and that will form part of any planning permission.
		Policy 19	New development need to pay for traffic calming & improved footpaths and dedicated cycle ways.	Comments noted. New development can only be required to mitigate against the impact that development has, although a developer may choose to do more.
		Overall, do you agree with the Neighbourhood Plan ?	Thank you all for all the hard work.	Comment noted.
		Sustainability Appraisal	Have not read this in detail to comment.	Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
24	Swanton Morley Resident. [name & address		Agree with policies 1-4 & 6-12 & 14-19 and Sustainability Appraisal. Neither agree or disagree with Policy 5. Disagree with Policy 13.	Thank you for your comments.
	given but asked that these not be shared in a public document]	Policy 1	Swanton Morley needs to remain an independent village rather than merging into a suburb of Dereham through development of the land between the two.	Comments noted.
		Policy 3	As the village increases so will demand for the school. All persons using the school (children, parents, teachers and staff) have the right to be safe going to and from school. Additional parking, pathways and cycle paths will help with this.	Comments noted. It is important to take steps to improve safety for all.
		Policy 4	Local housing should be available to local people.	Comment noted.
		Policy 6	Thank you for working hard for the Swanton Morley community, for being our voices and allowing our voices to be heard.	Comments noted.
		Policy 8	Absolutely. Protection of open space in the village is incredibly important. The space we have is for everyone - allotments, parks, bowls, cricket pitch etc.	Comments noted.
		Policy 12	We should encourage local tradesmen to complete the development works and local businesses to supply the materials, rather	Comments noted. Whilst this is encouraged it is not possible to make this a requirement.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			than large, national companies.	
		Policy 13	No. Although parking spaces are desirable, so are open spaces and reduced development where possible. Most houses do not have 3 or more cars therefore additional spaces are not necessary.	Comments noted. The issue of pavement parking has been raised through the community events with no easy solution. It is felt that with the very high dependency on the car in Swanton Morley; the provision of more off-road parking in new developments will may it less likely in these developments.
		Policy 14	Flood risk assessments must be carried out and plans put in place for all should a flood occur.	Comments noted.
		Policy 15	To enable a range of residents to live in the village.	Comment noted.
		Policy 16	In 2017, mobile signal and internet both a must, not a want!	Comment noted.
		Policy 17	The village needs local shops and facilities which can employ local people to serve local people.	Comment noted.
		Policy 19	Unfortunately developments to the village will almost certainly result in additional traffic.	Comment noted. This Policy seeks to see that increase assessed and measures put in place to mitigate the negative impact.
		Overall, do you agree with the Neighbourhood Plan ?	Thank you for compiling this thorough neighbourhood plan which I am sure has taken a lot of work. Whilst developments are inevitably needed due to a growing	Comments noted.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			population, I hope that the core of Swanton Morley village will remain - a close knit, positive, supportive village.	
		Other comments	PLEASE NOTE THAT I DO NOT WISH MY PERSONAL INFORMATION TO BE MADE PUBLIC IN ANY WAY AND THAT MY COMMENTS ARE TO REMAIN	Comments noted. Name and address not included.
			ANONYMOUS IN THE PUBLIC DOCUMENT	Proposed action:- No changes proposed to the Neighbourhood Plan.
25	J. Wilton Woodgate Swanton Morley		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support and your comments.
		Growth Policies	Whilst I agree overall with the policy any future development does need to take into account whether the "service centres" eg. Doctors and school specifically are able to cope rather than assume that they will grow to cope with the demand. Also exception sites should be identified early on rather than	Comments noted. As part of the emerging Local Plan Breckland District Council will be consulting with the Clinical Commissioning Group, regarding doctor numbers, and Norfolk County Council, regarding school place numbers.
			left till realised.	Proposals for Exception Sites will only come forward, if at all, on an adhoc basis as providers seek to increase the stock of affordable housing and to meet specific need.
		Landscape & Environment Policies	Landscaping should be sympathetic and green spaces respected and not considered in the future as "exception sites".	Comments noted. Although it should be noted that affordable housing for local people could be recognised as a community benefit.
		Design Policies	Hopefully any new development will	Comments noted. These Policies are positively

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			enhance the village not detract – there are enough ugly developments in the area.	positioned to achieve better developments that enhance Swanton Morley.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
26	Rob Sanderson Senior Town Planner		Swanton Morley Neighbourhood Plan (Pre- Submission Version)	Thank you for your support and your comments.
	Defence Infrastructure Organisation Kingston Road Sutton Coldfield West Midlands B75 7RL		As you are aware, the Swanton Morley Neighbourhood Plan boundary includes part of the Robertson Barracks site: the majority of the disused airfield is outside the Neighbourhood Plan boundary, but most of the Barrack buildings and associated facilities are inside. The Defence Infrastructure Organisation, (DIO), manages the Defence estate on behalf of MOD and has the following comments on the Neighbourhood Plan.	Thank you for confirming the situation.
			DIO welcomes the recognition in the Plan of the importance of the Robertson Barracks site to Swanton Morley and shares the desire of the Parish Council to avoid the site standing empty for any significant length of time when it is vacated by MOD in 2031. We believe that the site as a whole can make a significant contribution to meeting local (and wider) development needs and look forward to discussing the future of the site with both the Parish Council and Breckland	Comments noted. Your early involvement of Breckland District Council and Swanton Morley Parish Council at the right time is appreciated.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Council in due course.	
			There is clearly a strong relationship between the Barracks and the existing Service Family Accommodation close to it, with residents working at the Barracks and benefitting from the facilities there. However, please note that the existing dwellings are leased by MOD from a private company, Annington Homes Ltd. and that, when no longer required by MOD, they will revert back to that company. In other instances, dwellings returned to Annington Homes have been sold or leased on the open market, although that would be a matter for Annington Homes at the time. (Please note, though, that MOD could retain the dwellings even after Robertson Barracks has closed, to accommodate personnel serving on other sites. Closer to the date for vacating the site, MOD will need to undertake further work to clarify its housing requirement).	Comments noted and thank you for clarifying the current situation with Annington Homes Ltd and the possible future use of the accommodation by the MOD.
			You will appreciate that when the Barracks closes, the existing facilities on the site are also likely to close and a key issue in considering the future of the site will be how to maintain reasonable access to services for the community there.	Comments noted. We thank you for considering, albeit in the future, the use of facilities.
		Section 2.9	Moving on to specific comments on the contents of the Plan, the boundary shown in	Comments noted.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Robertson Barracks, Map 3	Map 3: Housing at Robertson Barracks is incorrect: it includes all of the Technical, Single Living Accommodation and support facilities within it, as well as the dwellings adjacent to the site.	
			The attached Plan shows the MOD land coloured dark green and also, in light green, the area owned by Annington Homes Ltd Either Map 3 should be changed to show only the boundary of the adjacent housing site or the Map title and boundary should be changed to show the Barracks site as a whole (perhaps with the area outside the Neighbourhood Plan boundary shown by a dashed line).	Comments noted. Map 3 will be updated to highlight the dwellings adjacent to the site.
		Policy 8	I note that the existing Sports Pitches at Robertson Barracks are identified in Table 3 as an Area of Important Open Space and under Policy 8: Protection of Open Space are protected from development that would involve their loss in whole or part, unless the benefit to the local community outweighs the loss. I am unclear as to the justification for identifying them within the Plan. Table 2 indicates that there are already 3.78 ha of outdoor sports facilities within Swanton Morley against a requirement for 3.69 ha, without the pitches	Comments noted. The Sports Pitches at Robertson Barracks will be removed from Table 3.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			at the Barracks being taken into account, and a further 7.54 ha would represent a massive over provision. If the justification for their retention is on visual amenity grounds, that should be stated in the Plan. However, they are not located within the built area of Swanton Morley and their development is unlikely to have a significant effect on the 'village feel' of the settlement. Given the lack of clear justification within the Plan, DIO objects to the identification of the Sports Pitches at Robertson Barracks as Areas of Important Open Space and recommends that they be omitted from Table 3.	
				Comments noted. It is hoped that the long- term future of the site can be identified and secured.
			site that is right for both Defence and the local community.	Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.
				Map 3: replace to highlight adjacent dwellings at Robertson Barracks.
				Table 3: remove Sports Pitches from the table.
27	F. Shapland Lead Adviser Planning & Conservation		Thank you for consulting with Natural England on the Swanton Morley Neighbourhood Plan.	Thank you for your support and your comments.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
	Natural England		We welcome many of the policies within the plan, which clearly take into account the protection and enhancement of the environment (including designated sites, green infrastructure and landscape character) and have no issues to raise regarding any of the policies within the plan.	Comments noted. Thank you for confirming your support for the policies in the Swanton Neighbourhood Plan and especially for the recognition of the protection and enhancement of the environment.
			We therefore have no further comments but would be happy to help if you have any queries.	Proposed action:- No changes proposed to the Neighbourhood Plan.
28	D. Sadler Town Street Swanton Morley NR20 4PB		Agree with policies 1, 4 & through to 19. Disagree with policies 2 & 3. Sustainability Appraisal: neither agree nor disagree.	Thank you for your support and your comments.
		Policy 2	This is dependent on the number of houses to be built on the sites.	Comment noted.
		Policy 3	There is no need to widen Hoe Rd East for housing. Passing places would be adequate. Unless this is to facilitate further planning as yet not submitted.	Comments noted. Part of Hoe Road East is single track and not appropriate, without upgrade, to be the access point for these sites.
		Policy 10	Enough damage has been done views already.	Comments noted. This is why protection is needed for what is left.
		Policy 14	Flood risk assessments must be backed up by more than words (penalty clauses perhaps).	Comments noted. The flood risk assessments will appraise the situation and, where appropriate identify mitigation measures to

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				be implemented to prevent the identified risk of flooding occurring.
		Policy 17	Integrated yes but not as a separate industrial estate.	Comments noted.
		Policy 19	Little has so far been done to improve the management or volume of traffic through the village.	Comments noted and this is why this Policy is important to Swanton Morley.
		Overall, do you agree with the Neighbourhood Plan ?	Yes, but it does signify reasonable growth. Swanton Morley is growing too big too fast. It will soon become a small town which is not wanted by the majority of residents.	Comments noted. The Swanton Morley Neighbourhood Plan seeks to retain the village feel and sense of community. These are key elements in the Vision for Swanton Morley.
		Sustainability Appraisal	Not all. There is some overkill.	Comments noted. The process of completing a sustainability appraisal is beyond the requirement of completing a Strategic Environmental Assessment. Whilst it does meeting the requirements necessary it provides a great deal of additional information, data and evaluation that has informed the Swanton Morley Neighbourhood Plan.
				Proposed action:- No changes proposed to the Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
29	L. Horstead Manns Lane Swanton Morley		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support.  Proposed action:- No changes proposed to
				the Neighbourhood Plan.
30	A. Sadler Town Street Swanton Morely NR20 4PB		Agree with policies 1, 4, 5, 6, 7, 8, 9, 11 & through to 19. Disagree with policies 2 & 3. Neither agree nor disagree with policy 10 and the Sustainability Appraisal.	Thank you for your support and your comments.
		Policy 2	The volume of traffic is horrendous now. Any more will be a nightmare.	Comments noted. Policy 19 of the Swanton Morley Neighbourhood Plan seeks to ensure the situation is not made any worse through new development and may possibly, through mitigation measures, make the situation better.
		Policy 3	A/A.	Comments noted (as above). The areas identified in (a), (b), (d) and (e) of Policy 3 seek to improve road safety.
		Policy 10	I can't answer this one any view that is destroyed is a bad thing!	Comment noted.
		Policy 14	Yes, but there is no guarantee the flooding won't happen, as we well know.	Comments noted. Flooding is far less likely to occur if the risk has been correctly assessed with mitigation measures identified and implemented.
		Policy 17	Only if they fit in with the area – not a separate industrial estate.	Comment noted.

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		Policy 19	Yes, but it hasn't happened so far.	Comment noted and will be addressed by having a Neighbourhood Plan for Swanton Morley.
		Overall, do you agree with the Neighbourhood Plan ?	It is actually quieter living in a town suburb than living on the road through Swanton Morley. It has gone too far already for all the residents living from Town Street to Dereham Road.	Comments noted.
		Sustainability Appraisal	Some I agree, others I don't !	Comment noted. As no specific has been detailed it has not been possible to specifically respond to those areas you do not agree with.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
31	P. Mayes Woodgate Swanton Morley NR20 4NU		Agree with policies 1, 2, 3, 7, 9, 10, 11 & 13. Disagree with policies 4, 5, 6, 8, 14, 15, 16, 17, 18 & 19. Neither agree nor disagree with policy 12 and the Sustainability Appraisal.	Thank you for your comments and support.
		Policy 1	Needs to go further, and protect individual hamlets from in-fill where roads and access are totally inappropriate. Such as Frogs Hall Lane proposals.	Comments note. In locations where roads and access are not appropriate development would not be sustainable and, therefore, would not be granted planning permission.
		Policy 2	Needs to go further – the whole of	Comments noted. The allocation of these

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			development should be only within these areas – for the avoidance of any future doubt.	three sites is supported by the local community and Breckland District Council which makes them the preferred location for future development. Sadly, this does not stop landowners and developers trying to develop on other sites although it does make it much more difficult for that to happen.
		Policy 4	This is a nonsense – there is no appetite for "Affordable" housing, and the survey on which this premise is based was totally pre- ordained – it gave no chance for ANYONE who did not identify that they had a need for "Affordable" to make any further comments.	Comments note. The Housing Need Survey conducted by Breckland District Council did identify a housing need for Swanton Morley. Breckland District Council also have a wider need to satisfy from the needs identified across the whole District.
		Policy 5	See above – the whole topic of "affordable" needs to be reconsidered.	Comments noted. The housing needs are continually assessed across the District by Breckland District Council.
		Policy 6	Not far enough – in order to be democratic and take account of local wishes, ALL planning needs to be supported by parish council, which must not be overruled.	Comments noted. It is the responsibility of Breckland District Council, as the Local Planning Authority, to determine planning applications. The Swanton Morley parish Council is a consultee, as are residents, to any planning application.
				Policy 6 is seeking to ensure that local knowledge is used to enhance the requirements and improve the quality delivery of community benefits.

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		Policy 7	Yes. Needs to be expanded to other, smaller green spaces.	Comments noted, although these three locations were identified as meeting all the requirements.
		Policy 8	No. Should not be permitted at all	Comments noted. There may be circumstances when development on these sites is appropriate and the loss of the open space is compensated for by the provision of a better or enhance facility for the community.
		Policy 12	No thoughts at all.	Comment noted.
		Policy 13	Yes. Quite reasonable.	Comment noted.
		Policy 14	No. This has probably been a criterion in past applications, but has failed miserably (as in Norwich Road, from the Lincoln house developments.	Comments noted. The Swanton Morey Neighbourhood Plan seeks to learn from previous mistakes and stop them from reoccurring.
		Policy 15	No. Irrelevant – all developments are applied for on one basis only, and that is greed. What is intended will never happen.	Comments noted. The Swanton Morey Neighbourhood Plan seeks to start to address the housing mix.
		Policy 16	No. This is a good idea, but is totally outwith any influence by parish council or indeed planning – it is totally down to will of all the commercial providers, therefore irrelevant.	Comments noted.
		Policy 17	No. Good idea, but won't happen as villagers will not support, but rather go to out of town centres.	Comments noted. Local employment should be encouraged and should the range and type of retail shop increase local

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				convenience should prevail.
		Policy 18	No. Again up to the will of the developers.	Comments note. If the local community does not ask it will not get.
		Policy 19	No. Good idea in principal, but will not have any affect.	Comments noted. As a Policy in the Swanton Morley Neighbourhood Plan this will deliver improvements to road safety.
		Overall, do you agree with the Neighbourhood Plan ?	No. Main problem is the concept of Affordable Housing, which is based on false premises engineered by the misleading wording on the survey undertaken. People who did not have a need for affordable housing were NOT encouraged or allowed to explain their views, so all the views simply represent those of the small proportion of people who do or will need affordable housing. Skewed & Flawed.	Comments noted, although you do note that there are people in need and the survey did identify them. Proposed action:- No changes proposed to the Neighbourhood Plan.
32	L. Vyse Middleton Ave Swanton Morley		Agree with policies 1, 3 & through to 19. Disagree with policy 2 Sustainability Appraisal – neither agree or disagree	Thank you for your support and your comments.
		Policy 2	These are <u>not</u> my preferred sites. I questioned the validity of feedback as more people residing near 001, 009, 004 attended the consultation to object to development in their area. Proportionally, 013, 014 was always going to be preferred	Comments noted. Your concern is acknowledged although this is not reflected in the results; whilst sites 001 and 004 where not supported site 009 received more support (52%) than not supported (48%).

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			site. Additionally, I do not feel we should build more than 85 houses prescribed subject to my comments above!	Comments noted. The level of new houses is identified to meet the need in Swanton Morley and the growth anticipated across the Breckland District.
		Policy 5	Yes. Although, I do <u>not</u> encourage development on exception sites.	Comments noted. Exception Sites are seen as a way to seek additional affordable housing to meet local needs.
		Policy 7	Smiley face drawn.	Smiley face noted.
		Policy 10	The irony is we can no longer enjoy this view due to the new development on Rectory Road !!!!!!!!	Comments noted.
		Overall, do you agree with the Neighbourhood Plan ?	Yes.	Comments noted.
		In you view are there any omissions from the draft Plan?	Definition of green space in glossary and also definition of 'exception site'.	Comments noted. Definitions will be added. Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.
				Glossary: add definitions for 'green space'
				and 'exception site'.

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33	S Vyse Middleton Ave Swanton Morley		Agree with policies 1, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19. Disagree with policy 2	Thank you for your support and your comments.
			Sustainability Appraisal – neither agree or disagree	
		Policy 2	Far too many houses planned. Building should be kept to a minimum.	Comments noted. The level of new houses is identified to meet the need in Swanton Morley and the growth anticipated across the Breckland District.
		Policy 11	Pathways do not need to cost - there are natural paths.	Comments noted.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
34	National Grid Amec Foster Wheeler		Swanton Morley Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID	Thank you for your comments.
	Environment & Infrastructure Ltd		National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its	Comments noted.
	R. Deanwood Consultant Town		behalf. We are instructed by our client to submit the following representation with	
	Planner AMec Fosert Wheeler E&I UK		regards to the above Neighbourhood Plan consultation.	
	Spencer Jefferies Development Liaison Officer		About National Grid National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the	Comments noted.

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	National Grid		Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system.	
			In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.	
			To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.	Comments noted.
			<b>Specific Comments</b> An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.	

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			National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.	Comments noted and thank you for confirmation.
			<u>Gas Distribution – Low / Medium Pressure</u> Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com	Comments noted.
			National Grid has provided information in relation to electricity and transmission assets via the following internet link: <u>http://www2.nationalgrid.com/uk/services/l</u> <u>and-and-development/planning-</u> <u>authority/shape-files/</u>	Comments noted. These will be reviewed and used to inform the Swanton Morley Neighbourhood Plan.
			The electricity distribution operator in Broadland District Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: <u>www.energynetworks.org.uk</u>	Comments noted and take it these actually refer to Breckland District Council.
			Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.	Comments noted.

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			We would be grateful if you could add our details shown below to your consultation database:	As requested, both names and contact details will be added to the Stakeholder database.
				Proposed action:- No changes proposed to the Neighbourhood Plan.
35	B. Marsham Worthing Road Swanton Morley NR20 4QD		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
36	A. Eggeling Historic Environment Planning Adviser Historic England		I am writing in relations to the following: Swanton Morley Parish Council Neighbourhood Plan 2017-2037, Breckland Norfolk [Case Ref. PL00063845] Thank you for your email regarding consultation on the Swanton Morley Neighbourhood Plan. Unfortunately due to our current staffing capacity we have been unable to response to this consultation in detail. Please find attached a letter explaining this. This letter also includes sources of advice you may find useful in the production of a neighbourhood plan. Apologies that we are not able to comment on this consultation in more detail at present. Please do continue to consult Historic England on later stages of the plan.	Thank you for your support, your comments have been noted and your earlier responses to the Swanton Morley Neighbourhood Plan Sustainability Appraisal Scoping Report have been used to inform both the Sustainability Appraisal Report and the Pre-Submission Consultation version of the Swanton Morley Neighbourhood Plan. Comments noted.

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			[Attached letter follows]	
			Ref: Swanton Morley Neighbourhood Development Plan Consultation Request	
			Thank you for your email inviting Historic England to respond to the consultation on the Swanton Morley Neighbourhood Development Plan.	
			Unfortunately, owing to current staffing capacity we will be unable to comment. We enclose a copy of our Neighbourhood Plan advice and would recommend that you consult the relevant conservation and archaeological specialists at Breckland District and Norfolk County councils.	Comments noted.
			Additional advice from Historic England you may find of use:	Comments noted. The additional advice will be reviewed and used to inform any
			HE Good Practice Advice in Planning 1 - the historic environment in local plans: <https: historicengland.org.uk="" images-<br="">books/publications/gpa1-historic- environment-local-plans/&gt;</https:>	necessary amendments to the Swanton Morley Neighbourhood Plan.
			HE Good Practice Advice in Planning 2 - managing significance in decision-taking in the historic environment: <https: historicengland.org.uk="" images-<="" td=""><td></td></https:>	

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			<u>books/publications/gpa2-managing-</u> significance-in-decision-taking/>	
			HE Good Practice Advice in Planning 3 - the setting of heritage assets: <https: historicengland.org.uk="" images-<br="">books/publications/gpa3-setting-of- heritage-assets/&gt;</https:>	
			HE Advice Note 1 - conservation area designation, appraisal and management: < <u>https://historicengland.org.uk/images-</u> <u>books/publications/conservation-area-</u> <u>designation-appraisal-management-</u> <u>advice-note-1/&gt;</u>	
			HE Advice Note 3 - site allocations in local plans: <https: historicengland.org.uk="" images-<br="">books/publications/historic-environment- and-site-allocations-in-local-plans/&gt;</https:>	
			HE Advice Note 7 - Local Listing: <https: images<br="" www.historicengland.org.uk="">-books/publications/local-heritage-listing- advice-note-7/&gt;</https:>	
			HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : < <u>https://historicengland.org.uk/images-</u> books/publications/sustainability-appraisal- and-strategic-environmental-assessment-	

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			advice-note-8/>	
			If you have specific questions which cannot be answered by your local conservation	Comments noted.
			and archaeological specialists, please contact Historic England's Historic Places Team who can be reached on 01223 582749.	Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.
				To review additional advice and update or amend as and where necessary.
37	Swanton Morley Resident Completed at		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support and your comments.
	Consultation Event – no name or address given.	Policy 13	Too many cars parked on main road.	Comment noted. This Policy will only address the issue on new development and will not resolve the current issue.
		Policy 16	Need better mobile signal.	Comment noted.
		Overall, do you agree with the Neighbourhood	If more houses are built then the support structure needs to be improved also.	Comment noted.
		Plan ?	More houses for local people who cant afford large mortgages.	Comment noted. Policy 4 of the Swanton Morley Neighbourhood Plan will enable people who live in or have a connection to Swanton Morley to access affordable houses.
				Proposed action:- No changes proposed to the Neighbourhood Plan.

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38	Megan Pashley Gladman Developments Ltd Gladman House		Swanton Morley Neighbourhood Development Plan Regulation 14 Consultation	
	Congleton Cheshire CW12 1LB		This letter provides the response of Gladman Developments Ltd (hereafter referred to as "Gladman") to the current consultation held by Swanton Morley Parish Council on the pre-submission version of the Swanton Morley Neighbourhood Plan (SMNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.	Thank you for your comments. It is pleasing to get input from a 'developers' point of view.
		Stakeholder List	Gladman requests to be added to the Parish Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.	Comments noted. Your contact details at Gladman's will be added to the stakeholder list.
			Gladman would like to offer their assistance in the preparation of the neighbourhood plan for the submission version of the neighbourhood plan and invite the Parish Council to get in touch regarding this.	Comments noted.
			Legal Requirements Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and	Comments noted, although basic conditions (b) and (c) only apply to a draft Development Order or a Community Right to Build Order and NOT to a Neighbourhood

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			Country Planning Act 1990 (as amended). The Basic Conditions that the SMNP must	Plan.
			meet are as follows:	The Basic Conditions Statement sets out how the Swanton Morley Neighbourhood Plan
			a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,	does meet the basic conditions.
			b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,	
			c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,	
			d) the making of the order contributes to the achievement of sustainable development,	
			e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),	
			f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and	

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			g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.	
			National Planning Policy Framework & Planning Practice Guidance National Planning Policy Framework The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so, it sets out the requirements for the preparation of neighbourhood plans and provides communities with the power to develop a shared vision for their neighbourhood and deliver sustainable development they need and to assist in the overall delivery of strategic housing needs.	Comments noted. The Swanton Morley Neighbourhood Plan aligns with the requirements of the National Planning Policy Framework; it is supportive and positive in providing guidance for future development in Swanton Morley.
			At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			applicable to the preparation of neighbourhood plans.	
			Paragraph 16 of the Framework further sets out that qualifying bodies preparing neighbourhood plans should develop plans that support the strategic development needs for housing and economic development and to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of a Local Plan.	
			Within the overarching roles that the planning system ought to play, the Steering Group should have regard to the core planning principles that underpin plan- making set out at paragraph 17 of the Framework. The core planning principles seek to ensure that a neighbourhood plan sets out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical policy framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding	

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			positively to the wider opportunities for growth.	
			Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood	
			Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.	
			Planning Practice Guidance It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).	Comments noted.
			On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			neighbourhood plan.	
			On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.	
			Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the SMNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.	Comments noted. The Swanton Morley Neighbourhood Plan has adopted a positive approach to the housing allocation from Breckland District Council in the Core Strategy and emerging Local Plan; seeking to identify how more, not less, development can be delivered in the village in a sustainable way.
			<b>Development Plan</b> <u>Adopted Development Plan</u> The current development plan relevant to the preparation of the SMNP consists of the	Comments noted.

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			Breckland District Council Core Strategy which was adopted by Breckland District Council (BDC) in December 2009.	
			The Core Strategy covers the period from 2001 to 2026 and provides the overarching spatial strategy for the District. This Plan is significantly out of date and time expired against the requirements of the Framework.	
			The Framework supersedes the contents of the adopted Development Plan requiring local planning authorities to identify and meet its OAN for housing in full.	
			Emerging Local Plan BDC are in the process of producing a new Local Plan (2011-2036) which will replace the Core Strategy and the suite of documents that make up the current adopted Local Plan.	Comments noted.
			Between 19th of September and 31st October 2016 the Council carried out its Preferred Site Options and Settlement Boundaries (Regulation 18) consultation on the Local Plan.	
			The Preferred Site Options and Settlement Boundaries document consulted on the development hierarchy, preferred sites, Snetterton employment area and the	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			approach to rural areas including alterations to settlement boundaries.	
			At present, BDC are anticipating the pre- submission draft of the Local Plan will be published for further consultation in the Spring of 2017.	
		Policy 1	As such, given that the Plan is in the relatively early stages of preparation, there remains considerable uncertainty over what level of development that Swanton Morley may need to accommodate to assist the Council in meeting full OAN. Accordingly, the Plan will need to ensure that it allows for sufficient flexibility to ensure that it is able to react to changes that may arise through the emerging Local Plan.	As highlighted the emerging Local Plan currently (as at September 2016) allocates to Swanton Morley a growth allocation of an additional 85 new dwellings, although in the earlier consultation (December 2015) the allocation number was significantly higher at an additional 145 new dwellings. Through the development and drafting of the Swanton Morley Neighbourhood Plan consideration has been given to meeting the allocation from Breckland District Council and positively addressing the local needs of Swanton Morley.
			Swanton Morley Neighbourhood Plan This section highlights the key issues that Gladman would like to raise with regards to the content of the SMNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance nor are they supported by the necessary evidence to justify their inclusion within the Plan. These policies significantly compromise the SMNP's ability	Comments noted. The Swanton Morley Neighbourhood Plan is supportive and positive in providing guidance for future development in Swanton Morley, is based on local evidence and justification and meets the requirements as set out in the Basic Conditions.

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			to meet the basic conditions.	
			In response to these policies, Gladman has sought to recommend a series of alternative options that should be explored prior to submitting the Plan to BDC for regulation 16 consultation.	Comments noted and your suggestions appreciated.
			Neighbourhood Plan Vison, Objectives and Policies	
			<ul> <li>Policy 1 – Protecting the Identity of Swanton Morley</li> <li>Policy 1 seeks to limit development outside the built up area boundary of Swanton Morley and prevent the visual break between Dereham being reduced.</li> <li>Gladman object to the use of built up boundary limit, as this would act to contain the physical growth of Swanton Morley without fully considering what result this policy will place on BDC's ability to deliver its</li> </ul>	Comments noted although it is disappointing that Gladman do not want to give consideration to the settlement boundary of Swanton Morley. It would seem that Gladman are advocating ignoring settlement boundaries. Breckland District Council will ensure sufficient development land is allocated to meet the identified housing requirements through the
			full OAN. The use of such a settlement limit would not accord with the positive and flexible approach required by the Framework and would be inconsistent with §14, §47 and §49.	plan period. Gladman seem to have misunderstood this Policy as it does not prevent development outside the settlement boundary (there are other Development Plan policies that set the requirements for that which are not repeated in the Swanton Morley Neighbourhood Plan). Instead Policy 1 of the Swanton Morley

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				Neighbourhood Plan seeks to maintain Swanton Morley as a distinct and separate village, as stated in the 'Ambition' statement in paragraph 6.18.
				Residents of Swanton Morley are concerned that as Dereham continues to expand there is a real danger that Swanton Morley will be swallowed as other outlying villages have.
			Further to this, there is no evidence to demonstrate that any significant development will come forward within the existing built form on previously developed land. Development proposals that are located outside the built up boundary should not be considered in conflict with the neighbourhood plan.	The National Planning Policy Framework, paragraph 80, recognises the needs "to prevent neighbouring towns merging into one another" and "to assist in safeguarding the countryside from encroachment". Suggesting Green Belt land as one way to achieve this; Policy 1 of the Swanton Morley Neighbourhood Plan seeks to achieve through an alternative and more flexible approach.
			Gladman also submit that new development can often be located between neighbouring towns and villages without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we would question the purpose of a such a limiting policy, particularly if this would prevent the	Comments noted. Agree and Policy 1 of the Swanton Morley Neighbourhood Plan does not prevent this unless it impacts in the way described in the policy. Any such development, assuming it was within the Swanton Morley Neighbourhood Area, would also be expected to meet the other policies in the Swanton Morley Neighbourhood Plan and the requirements of other Development Plan policies.

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			development of otherwise sustainable and deliverable housing sites coming forward.	
			In light of this, we consider a more flexible approach consistent with the requirements of the Framework is required and the submit the following wording for consideration: "When considering development proposals, the SMNP will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning	Comments noted, although the suggested wording will not deliver the ambition of the local community and prevent Swanton Morley from being swallowed up and becoming part of Dereham, therefore, Policy to remain unchanged.
			Policy Framework. Applications that accord with the policies of the Development Plan and the SMNP will be supported particularly where:	
			<ul> <li>Providing new homes including market and affordable housing; or</li> </ul>	
			<ul> <li>Opportunities for new business facilities through new or expanded premises; or</li> </ul>	
			<ul> <li>Infrastructure to ensure the continued vitality and viability of the neighbourhood area.</li> </ul>	
			Development adjacent to the existing	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.'	
		Policies 7 & 8	Policy 7 & Policy 8 – Local Green Spaces & Protection of Open Space These policies seek to allocate and protect land as Important Open Spaces and Local Green Spaces. The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy.	Comments noted. Each of the three areas identified as 'Local Green Space' meet the requirements of the National Planning Policy Framework, paragraphs 76 and 77.
			<ul> <li>The Framework is explicit in stating at paragraph 77 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the plan-makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:</li> <li>Where the green space is in reasonably close proximity to the community it serves;</li> <li>Where the green area is</li> </ul>	Comments noted.

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			<ul> <li>demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>Where the green area concerned is local in character and is not an extensive tract of land.</li> </ul>	
			It appears that no evidence has been provided to support the proposed designation identified at Policy 7 and Policy 8. As such, this brings into question whether all of the proposed designations are capable of meeting all three tests required by National Planning Policy. Gladman	Each of the three areas identified as 'Local Green Space' in Policy 7 of the Swanton Morley Neighbourhood Plan meet the requirements as set out. Details are given in Appendix 2 of the Swanton Morley Neighbourhood Plan.
			recommend that the Parish Council take the time to investigate this matter and undertake the necessary evidence to support each designation. Gladman reserve the right to comment on these policies at a later date.	The areas identified in Policy 8 of the Swanton Morley Neighbourhood Plan are not seeking the 'Local Green Space' designation, as it is recognised that it is not appropriate from these areas to do so.
		Policy 10		
			Policy 10 – Important Views New development can often be located on the edge of built areas without resulting in the loss of openness, character or views considered to be important by the local community. Quite often the delivery of new	Comments noted. Policy 10 of the Swanton Morley Neighbourhood Plan seeks to ensure these four beautiful and much appreciated views are enjoyed for generations to come. The Policy expects any development in these

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			sustainable development proposals can enhance existing landscape settings and provide new vistas and views to the surrounding area.	areas to be mindful to the ability to enable the continued enjoyment of that view.
			Notwithstanding the above, Gladman raise concerns with this policy in relation to the second paragraph of this policy. The Plan as currently proposed provides no clarity on what would amount to a significant effect on the landscape and views of the area, we therefore have reservations over how this policy will be applied in a consistent manner through the development management process. Opinions on landscape and views are highly subjective, therefore, without further clarity, this policy will likely lead to inconsistencies in the decision making process.	Comments noted. The Policy does not preclude any new development, instead seeking to ensure that new development would respect these views; providing an appropriate balance between the presumption of sustainable development and the protection of local distinctiveness. Breckland District Settlement Fringe Landscape Assessment (July 2007) provides a great deal of detail and the unique character, topography and settings. Whilst elements of this are highlighted in the supporting text of the Swanton Morley Neighbourhood Plan in paragraphs 6.104 to 6.110 and 6.141 to 6.152.
		Policy 12		Paragraph 6.153 sets out the ambition of Policy 10 of the Swanton Morley Neighbourhood Plan.
		,	Policy 12 – Design of Development This policy sets out the design principles that will be applied to residential development proposals in the Neighbourhood Plan Area. The Parish Council should ensure that the design principle adhered to are not overly	Comments noted. The requirements of Policy 12 of the Swanton Morley Neighbourhood Plan are seen as vital to enhance future development, provide better homes for future residents of Swanton Morley to be proud to live in whilst being respectful to the exiting

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Policy 15	onerous to render development unviable. The Framework is clear 'design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.' Plans should not contain such policies that would add financial burdens to a scheme which would render a scheme unviable. The objectives of the Framework are for good design whilst still enabling sustainable development to come forward viably.	character of the village and community. None of these requirements are seen as being onerous to deliver, a view it would seem that Gladman's also have; as none of the requirements has been specifically or cumulatively identified as being onerous by Gladman's.
		Policy 15	<ul> <li>Policy 15 – Housing Mix</li> <li>This policy seeks to define a specific housing mix that all development in the Neighbourhood Plan Area will be required to meet.</li> <li>Whilst recognising the importance of this policy, the housing mix and tenure required can alter and the evidence supporting this position only reflects a single point in time. Accordingly, there may be a need to divert from Policy 15 where development could be found unviable.</li> </ul>	Comments noted. The supporting text to Policy 15 of the Swanton Morley Neighbourhood Plan explains the current situation of the housing mix and how recent development has continued to exacerbate the problem and failed to meet housing needs. The delivery ranges provided within Policy 15 are sufficiently flexibility that viability issues solely associated with the housing mix should not arise. The Policy identifies the resolution and, at least in part, to address the situation through the plan period of the Swanton
			It is therefore recommended that 'subject to viability' and 'any future housing needs	through the plan period of the Swanton Morley Neighbourhood Plan to match the

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			evidence' be reflected in the policy wording to ensure a more flexible approach.	identified housing needs.
			Strategic Environmental Assessment The preparation of Neighbourhood Plans falls under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would likely result in significant adverse environmental effects.	Comments noted. The requirements of the Strategic Environmental Assessment have been acknowledged. The initial screening request was made to Breckland District Council on 12 <sup>th</sup> February 2016 (see Appendix 8 of the Sustainability Appraisal Scoping Final Report). Whilst the
			Both the SEA Directive and Neighbourhood Planning sections of the PPG make clear that an SEA Screening Assessment should be	approach and compliance to the SEA Directive was set out in Appendix 2 and Appendix 3 of that report.
			undertaken at the earliest opportunity1. However, it is currently unclear from the consultation documents whether the need for SEA has been investigated at this stage.	The screening determination (see Appendix T of the Sustainability Appraisal Final Report) has now been completed. It concludes that the Swanton Morley Neighbourhood Plan is unlikely to have any significant environmental
			1 PPG Paragraph: 028 Reference ID: 11-028- 20150209 The Environmental Assessment of Plans and Programmes 2004 makes clear at paragraph 12(2) that:	effect and will not require a Strategic Environmental Assessment. The reasons for the determination are also publish in Appendix T.
			'The report shall identify, describe and evaluate the likely significant effects on the environment of- a) Implementing the plan or programme; and b) Reasonable alternatives taking into	The Sustainability Appraisal assesses each of the policies within the Swanton Morley Neighbourhood Plan against each of the 17 SA Objectives in the SA Framework agreed with the Statutory Bodies.
			account the objectives and geographical	Alternatives to each of the policies are

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			<ul> <li>scope of the plan or programme.'</li> <li>Should the need for SEA be required, it is important that the SMNP be tested against a range of reasonable alternatives. Failure to ensure that this requirement is met could have significant implications for the SMNP following the recent judgment in the High Court2. This is a significant decision which found that: <ol> <li>It is incumbent on plan makers, the independent Examiner and the making authority that the Plan is compliant with EU legislation.</li> <li>The plan maker is required to undertake an objective assessment of the policies of the plan when discharging the duty above.</li> <li>That alternatives need to be accurately presented in order for the SA/SEA of a Plan to comply with European legislation.</li> <li>All key policies of the plan need to be assessed against reasonable alternatives to have a EU law compliant SA/SEA.</li> </ol> </li> </ul>	detailed as part of the assessment of each policy in the Sustainability Appraisal Final Report in Appendices A to S. More details of the alternatives suggested and considered are detailed in the Emerging Policy Statements Discussion Document, which is contained in an appendix in the Consultation Statement that forms one of the supporting documents that will be submitted with the Swanton Morley Neighbourhood Plan.
			<b>Conclusion</b> Gladman recognises the role of	Comments noted. The Swanton Morley
			Gladman recognises the role of neighbourhood plans as a tool for local	Neighbourhood Plan Steering Group have

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			people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national policy and the up- to-date strategic requirements for the wider local authority area. Through this consultation response, Gladman have sought to clarify the relation of the SMNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.	been very pleased that Gladman's have engaged with the process and made a number of suggestions from a developer's prospective. It is also noted, and pleasing to see, that there are few specific concerns raised (only Policy 15) and no elements identified in respect of policies in the Growth and Design themes of Swanton Morley Neighbourhood Plan that are in themselves seen as excessive or too onerous to a prospective developer. The concerns raised by Gladman's on Policy 15 of the Swanton Morley Neighbourhood Plan, relating to viability, is recognised as being key to delivering successful development but it is seen that Policy 15 has a degree of inbuilt flexibility that should give the required scope to any developer; whilst still starting to address the local situation in the plan period of the Swanton Morley Neighbourhood Plan that is seen as so important to the local community seeking
				housing that is affordable and meeting local need.
			Gladman is concerned that the plan in its current form does not fully comply with basic conditions (a) and (d) as the plan needs to further clarify its stance towards to development. In this regard a series of modifications have been suggested which	Comments noted. The Swanton Morley Neighbourhood Plan does comply with the Basic Conditions although in view of the comments and suggestions made, it will be reviewed, to seek to frame elements in the positive towards the presumption of

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			we consider are necessary for the Plan to meet the basic conditions.	sustainable development.
			I hope you have found this letter to be constructive. Should you require any further information please do not hesitate to contact me or a member of the Gladman team.	Proposed action:- No changes proposed to the Neighbourhood Plan.
39	Hannah Wilson Planning Liaison Manager <b>Anglian Water</b> <b>Services Ltd</b> Peterborough PE3 6WT		Swanton Morley Neighbourhood Plan – Pre Submission Thank you for giving Anglian Water the opportunity to comment on the Swanton Morley Neighbourhood Development Plan. Please find enclosed Anglian Water's comments.	
		Growth:Theme 1	Paragraph 6.36 This ambition is supported.	Thank you for your support and your comments.
		Design: Theme 3 Flooding	Flooding Anglian Water is supportive of this section, however, paragraph 6.187 states the need for sustainable drainage systems yet this is not made a requirement in the policy. To ensure the delivery of SuDs on new	Comments noted. Policy 14 of the Swanton Morley Neighbourhood Plan has been updated to follow the suggested changes recommended by Norfolk County Council as the Lead local Flood Authority and now does
		Policy 14	developments it is suggested that policy 14 – Flooding, includes SuDs. The used water flows from future growth will have an impact on the existing used water	include specific reference to the inclusion of Sustainable Drainage Systems (SuDS) and the requirement to provide future maintenance and management funding for any such mitigation measures.

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			network. The used water infrastructure requirements will be dependant on the location, size and phasing of the development.	
			All sites will require a local connection to the existing sewerage network which may include network upgrades. Therefore a requirement for planning applications to be accompanied by a sewage capacity assessment is recommended.	Comments noted. An extra criteria will be added to Policy 12 to require developments of 10 or more to have undertaken a sewage capacity assessment.
			It would be advisable to include a policy that clearly states a used water drainage solution will need to be identified and implemented prior to occupation.	Comments noted. The suggestion of implementation prior to occupation makes sense and will be included in supporting text and Policy 14.
			Anglian Water offers a pre planning service which includes a capacity check to determine the impact of sewage from a proposed development. We will also work with the developer or landowner during this process to develop foul and surface water (where applicable) drainage solutions which will not cause a detriment to our existing customers or future customers. We would encourage the prospective developer to contact us at the earliest convenience to discuss drainage proposals to serve the	
			development.	Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				Policy 12: add extra criteria "All planning applications for developments of 10 or more dwellings and all commercial development to have undertaken a sewage capacity assessment.
				Policy 14: amend to include "water drainage solution to be implementation prior to occupation"
40	C. Westbury Hannah Road Swanton Morley		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support and your comments.
	NR20 4PF	Policy 6	This definately needs to be adhered to.	Comments noted.
		Policy 13	This needs to be addressed as there is far too much parking on the grass verges in our area of the village and we do not wish to see more of this.	Comments noted. Indiscriminate parking is a concern and whilst Policy 12 criteria (5) specifically identifies this issue to be addressed. Norfolk County Council, in their response, has made a suggested solution.
		Policy 15	A need for smaller houses as the population ages, but people want to stay within the village.	Comments and support noted. Proposed action:- No changes proposed to the Neighbourhood Plan.
41	S. Westbury Hannah Road		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support.
	Swanton Morley NR20 4PF			Proposed action:- No changes proposed to the Neighbourhood Plan.

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42	Mr. Pat Abbott Planning Advisor Environment		Agree with all 14 policies and Sustainability Appraisal.	Thank you for your support.
	Agency			Comments noted and the reference documents suggested will be reviewed and any necessary amendments or additions will be made to the Swanton Morley Neighbourhood Plan and supporting documents.
			<ul> <li>Our principal aims are to protect and improve the environment, and to promote sustainable development, we:</li> <li>Act to reduce climate change and its consequences</li> <li>Protect and improve water, land and air</li> <li>Work with people and communities to create better places</li> <li>Work with businesses and other organisations to use resources wisely</li> </ul>	
			<ul><li>You may find the following two documents useful; they provide:</li><li>an overview of our role in development and when you should</li></ul>	

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			<ul> <li>contact us;</li> <li>initial advice on how to manage the environmental impact and opportunities of development;</li> <li>signposting to further information which will help you with development;</li> <li>links to the consents and permits you or developers may need from us.</li> </ul>	
			Building a better environment: Our role in development and how we can help: <u>https://www.gov.uk/government/uploads/sys</u> <u>tem/uploads/attachment_data/file/289894/LI</u> <u>T_2745_c8ed3d.pdf</u>	
			Environmental Quality in Spatial Planning http://www.englishheritage.org.uk/publicatio ns/environmental-quality-in-spatial-planning- supplementary-files/	
			•	Comments noted and thank you for your support in the work and activities that have been undertaken.
			The Water Framework Directive through the River Basin Management Plan sets out environmental objectives that will need to be met for surface and groundwater bodies in	

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			order to comply with to ensure water quality is maintained.	
				Comments noted. The Swanton Morley Neighbourhood Plan whilst being positive in its approach to development also seeks to see gains in sustainable growth, such as
			Landscaping proposals should demonstrate that thought has been given to maximising potential ecological enhancement.	biodiversity.
			Paragraph 9 of the NPPF sets out that planning should seek positive improvements and includes an aim to move from a net loss of biodiversity to achieving net gains for nature in line with the Natural Environment White Paper (2011).	
			In determining planning applications Local Authorities are asked to conserve and enhance biodiversity and encourage opportunities to incorporate biodiversity in and around developments (para.118).	
			This presents an opportunity to provide multi- functional benefits - providing open space for residents, sustainable transport links, wildlife/ecological value, climate change resilience, improved water quality and flood risk management.	

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			Green Infrastructure, defined as a network of new and existing multi-functional green space and features, such as ecological corridors or other appropriate planting, should therefore be considered as part of the development.	Comments noted.
			Such measures can provide the range of benefits outlined above, including for example providing shade to the built environment to reduce overheating, and intercepting rainfall and reducing flood risk. But there is evidence that the inclusion of such features can also provide further economic benefits, such as encouraging inward investment, increasing property values and increasing visitor spending in an area.	
			More information on this, and Green Infrastructure in general, is available on the Natural England web pages: www.naturalengland.org.uk/ourwork/planningde velopment/greeninfrastructure/default.aspx	
			Incorporating green and/or brown roofs and walls can be a particularly effective measure. They provide valuable urban habitats, increased energy efficiency of buildings and attenuation of rain water. Research from the journal 'Environmental Science and Technology' claims that green walls deliver cleaner air at street level where most people	Comments noted. The use of green and/ or brown roofs and walls would be looked upon favourably although at this time it is not possible to stipulate or justify as a policy requirement.

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			are exposed to the highest pollution. They can also add to an attractive street scene if designed well – a good example of this is the Transport for London Green Wall near Blackfriars station.	
			Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.	Comments noted.
			Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.	
			We trust this advice is helpful.	Proposed action:- No changes proposed to the Neighbourhood Plan.
43	Norfolk County Council		Norfolk County Council Comments on the: Swanton Morley Neighbourhood Plan Reg 14 23 <sup>rd</sup> February 2017	Thank you for responding and your support and your comments.
			<ol> <li>Introduction</li> <li>1.1 The County Council welcomes the opportunity to comment on the</li> </ol>	Comments noted and thank you for the recognition of the effort and time that has

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			emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.	been put in by the local community, especially the Steering Group.
		Vision, Aims & Objectives	<ol> <li>General Comments</li> <li>The County Council supports the Vision, Aims and Objectives set out in the Plan (pages 22 and 23). In particular the County Council supports reference to ensuring key infrastructure such as schools and health being preserved or improved. Support is also given to the aims and objectives relating to the environment; and economy.</li> </ol>	Comments noted. It is recognised that the required infrastructure to accommodate the expected growth of Swanton Morley will only be delivered with cross agency support and it is noted that Norfolk County Council recognises their key role in realising the Vision and Objectives for Swanton Morley.
			<ul> <li>3. Infrastructure Delivery</li> <li>3.1 The County Council welcomes reference in the supporting text (paragraphs 6.244 and 6.245) to local infrastructure and improved infrastructure being funded through \$106 / \$278 agreements or by the use of a Community Infrastructure Levy (CIL) in the event the District Council prepare a CIL Charging schedule. This addresses the issue raised by the County Council in August 2016 in response to the Neighbourhood Plan Sustainability Appraisal Scoping Report.</li> </ul>	Comments noted. The response and suggestions received from Norfolk County Council on the Swanton Morley Sustainability Appraisal Scoping Report have being used to inform the Swanton Morley Neighbourhood Plan.
		Policy 6	3.2 The County Council also welcomes the inclusion in the Plan of Policy 6 covering	Comments noted.

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			the Delivery of planning obligations and would suggest:	
			(a) Including the text in paragraphs 6.244 and 6.245 in the supporting section to Policy 6;	The supporting text will be updated to include text from sections 6.244 and 6.245.
			(b) Adding reference in Policy 6 "that the County Council will also be a signatory to those \$106s involving County Council infrastructure/services such as schools; library; fire hydrant or transport provision".	Norfolk County Council will be added to the Policy text as a signatory.
			3.3 Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development.	Comments noted. The inclusion in the requirements of Policy 12 is not possible; as this could be seen as being overly onerous without any evidence to justify why this specific requirement is necessary for Swanton Morley Neighbourhood Area but not policy for any other area of Norfolk or UK. In recognition of Norfolk County Council's request to refer to the installation of sprinklers this will be included in the supporting text for this theme.
		Policy 11	<ul> <li>4. Environment</li> <li>4.1 The policies relating to biodiversity and access to the countryside are supported. However it is suggested that the Neighbourhood Plan should refer to the local County Wildlife Sites or to the</li> </ul>	Comments noted. Text will be added to the supporting section to reference the local County Wildlife Sites.

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			Wensum Trail.	
			4.2 Should you have any queries with the above environmental comments please call Dr David White (Senior Green Infrastructure Officer).	
		Policy 14	<ol> <li>Lead Local Flood Authority The County Council considers that Policy 14 (Flooding) should be replaced with the following policy;</li> </ol>	
			5.2 INTENTION The Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Swanton Morley area. It seeks to promote a range of assessment and mitigation measures that will ensure that any future development (or redevelopment) will have a neutral or positive impact on flooding.	Comments note.
			5.3 POLICY: FLOODING/DRAINAGE The 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.	Comments note.

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			<ul> <li>Any new development or significant alteration to an existing building within the Swanton Morley area 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:</li> <li>Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.</li> <li>Have a neutral or positive impact on surface water drainage.</li> </ul>	Comments noted. Thank you for suggesting expanding Policy 14 to cover a wider range of flood risk. The policy will be amended to include Norfolk County Council's, as the Lead Flood Agency, wording.
			<ul> <li>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:</li> <li>Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).</li> <li>Where appropriate undertake sequential and /or exception tests.</li> <li>Locate only compatible</li> </ul>	

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		<ul> <li>development in areas at risk of flooding, considering the proposed vulnerability of land use.</li> <li>Inclusion of appropriate allowances for climate change</li> <li>Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul>	

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			Economic Growth Planner).	
		Policy 3	<ul> <li>6. Transport</li> <li>6.1 Policy 3. The road widening, calming and parking measures seem a sensible way forward to address existing issues and improve safety, bearing in mind the increased movement activity associated with the growth. Any existing NCC</li> </ul>	Comments noted and support for the measures proposed is appreciated.
			policies for visitor/drop off parking at schools will need to be adhered to. It may also be worth considering improvements to pedestrian routes to accompany these measures and encourage children living in the new houses to walk to school. These are potential mitigation measures that can be sought from developers.	Criteria (d) and (e) of Policy 3 seeks to see enhancement to the pedestrian routes and a logical joining up with the existing network to promote more sustainable modes of children safely accessing their school.
		Policy 12	6.2 Policy 12. Point 5. Could be enhanced to address the issue of needing to cater for indiscriminate parking where it is likely to occur. Often, despite high levels of private off road parking, residents still like to park outside their house. In view of this on street parking should be anticipated and catered for to avoid indiscriminate parking (e.g. on the outside of unnecessary bends in the road that block footways and cause difficulties for cars to pass). Possible solutions are straight roads with sufficient width to	Comments noted. Text will be added to the criteria to included design in measures to avoid indiscriminate parking.

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			allow for parked cars.	
		Policy 13	6.3 Policy 13. Rather than the last paragraph suggesting that communal parking could offset the off-street requirement for dwellings, it is suggested one on street parking space is provided per dwelling that does not compromise the passage of pedestrians or vehicles on the road.	Comments note. The Steering Group felt that with narrow roads likely they did not want to encourage on street parking; as this is a current issue on the recent developments.
		Policy 19	<ul> <li>6.4 Policy 19. The need for Transport Assessments are usually associated with sites in excess of 100 dwellings. Bearing this in mind it does not preclude seeking developers to provide appropriate highway/parking mitigation, as suggested in the plan. Whereas the numbers of additional vehicles are likely to be low, they could represent a high percentage increase to the existing traffic levels.</li> <li>6.5 Should you have any queries with the above transport comments please call lan Parkes (Senior Infrastructure and Economic Growth Planner).</li> </ul>	Comments noted, thank you for recognising what could be seen as a relatively low level increase of traffic may, in fact, be of high impact to Swanton Morley. It has been recognised that it may be disproportionate to expect all development to undertake this level of assessment. Policy 19 will be amended to require this level of assessment on new residential development of 10 or more dwellings and all commercial development.
			<ul> <li>7. Historic Environments</li> <li>7.1 None of the proposed policies within the draft of the Swanton Morley Neighbourhood Plan relate specifically to the historic environment. This is not</li> </ul>	Comments noted, although it should be noted that Policy 12, criteria (1) does require "Respecting and protecting local heritage assets and their settings"

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			necessarily an issue as the management of the historic environment is adequately addressed by the relevant policies within the National Planning Policy Framework and there is no need for them to be covered further in the Neighbourhood Plan.	
			However, one aspect that we will highlight relates to Section 6.138 Important Views. In this section the Neighbourhood Plan considers the importance of key views from the village, including from the churchyard. The Neighbourhood Plan may also wish to consider the significance of views towards the village within this section – particularly those that include designated heritage assets such as the Grade I listed All Saints' church.	Comments noted. Whilst there are may stunning views from and to Swanton Morley the four identified are seen as the key ones to protect and provide the greatest enjoyment.
			7.2 Should you have any queries with the above comments please call or James Albone (Planning Archaeologist).	
			<ol> <li>Economic Development</li> <li>The County Council welcomes the focus of small scale rural based employment in Swanton Morley.</li> </ol>	Comments noted.
			8.2 Reference to the Robertson Barracks in the draft Neighbourhood Plan and its	Comments noted. It is appreciated that Norfolk County Council recognise that there

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			planned closure in 2031 is considered appropriate. Ultimately there will need to be a comprehensive planning strategy / masterplan for the re-use of the site post 2031 and this will need to involve a number of Stakeholders, including: the MOD; Norfolk County Council; Breckland District Council; and the Parish Council.	will be a need to plan very carefully the closure and future use of the site with Stakeholders at the right time.
			8.3 Should you have any queries with the above comments please call or David Dukes (Economic Development Manager).	Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.
				6.85. Delivery of Planning Obligations: Insert text in section to explain the contribution to infrastructure by development in further support of Policy 6.
				Policy 6: Add " and where appropriate Norfolk County Council."
				6.165. Design of New Development:
				Insert a paragraph of text to say "Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives.
				Inset a paragraph to of text to recognise the issue of indiscriminate parking and measures

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				to avoid it. Add the text "Norfolk County Council, through the consultation process, want to address the issue of needing to cater for indiscriminate parking where it is likely to occur. Often, despite high levels of private off road parking, residents still like to park outside their house. In view of this Norfolk County Council would stated on street parking should be anticipated and catered for to avoid indiscriminate parking (e.g. on the outside of unnecessary bends in the road that block footways and cause difficulties for cars to pass). Possible solutions are straight roads with sufficient width to allow for parked cars." Policy 12, criteria (5): Add text " and design in measures to avoid it. " 6.157. Accessibility and Biodiversity: add text to this section to reference the local County Wildlife Sites. Policy 14: amend Policy text to cover the wider range of flood risk using Norfolk County Council's wording.
44	J. Rodrigues Gooseberry Hill Swanton Morley NR20 4PP		ee with all 19 policies and Sustainability raisal.	Thank you for your support. Proposed action:- No changes proposed to the Neighbourhood Plan.
45	J. Neave Gray Drive	-	ee with policies 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16 & 19.	Thank you for your support and your comments.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
	Swanton Morley NR20 4PG		Disagree with policies 4, 17 & 18. Sustainability Appraisal – neither agree or disagree	
		Policy 3	Enough provision at school in place before growth.	Comments noted. Norfolk County Council has the responsibility to ensure there are adequate school places and review across the district to formulate their future plans and timetable.
		Policy 4	Housing cannot be guaranteed or held for local people.	Comments noted, although it should be noted that Policy 4 will ensure that local people who are on the Breckland District Council housing register will have access to affordable housing in Swanton Morley.
		Policy 6	Only if integral to community – we don't need Tesco etc.	Comments noted.
		Policy 7	More please! Not just playgrounds but areas for wildlife eg. around school.	Comments noted. These areas have been specifically identified as meeting the criteria for 'Local Green Spaces' as defined in the National Planning Policy Framework. Policy 8 seeks to provide protection to further areas that do not meet the criteria.
		Policy 8	Widening Hoe Rd East will mean cutting down ancient trees.	Comment noted. It is understood that the loss would be of one sycamore tree.
		Policy 11	Within reason – why can't the village hall car park be used for school pick up?	Comment noted. Some parents do make use of this car park.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Policy 12	Current new build not in keeping of rest of village.	Comment noted. Policy 12 is looking to improve the design of development, specifically criteria (2) to recognise and reinforce character.
		Policy 14	Yes and natural drainage.	Comment noted. Policy 14 is being amended to cover a wider range of flood issues and to specifically identify sustainable drainage systems (SuDS) as a possible solution.
		Policy 15	The current new build does not provide adequate affordable housing.	Comment noted. Current Breckland District Council policy is for new development to provide 40% affordable housing.
		Policy 17	No. Most people probably work out of the village and would prefer it as separate to work life.	Comment noted. Individuals will always make their own choices but creating additional opportunities will help to make Swanton Morley a more sustainable community. Reducing the distance travelled to work is seen as a key way to reduce the dependency on the car and help to mitigate against the production of greenhouse gases – reducing the impact of climate change.
		Policy 18	Only if necessary – Dereham has enough facilities.	Comment noted. The issue is being able to travel to facilities if they are in Dereham.
		Policy 19	Within reason – provide solutions to problems first with what exists already.	Comment noted. New development can only be asked to mitigate against the impact that new development has. The existing problems will have to be resolved in a different way.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Overall, do you agree with the Neighbourhood Plan ?	Yes, understand change is necessary however to gain certain things like more facilities means the loss of something else eg. countryside which is what most people want to protect.	Comments noted. Swanton Morley is going to grow to meet the needs of the community. History has seen this in Swanton Morley and is documented in Table 1. Your own property was built as a need to originally house RAF personnel. The important thing is to get growth in the right places for Swanton Morley and to try to prevent the loss of grade 1 and 2 farmland.
		Sustainability Appraisal	Not sure where this is in the report but there should be more protected areas of significance eg. Bird of pray.	Comments noted. Policy 11 recognises the need to enhance biodiversity, including wildlife habitats. The Sustainability Appraisal Scoping Report does identify the Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and County Wildlife Sites (CWS).
			Significance around the school area recent increase in litter around the village – more people means more waste. Bins needed especially round the river (Mill Street).	Comments noted. Proposed action:- No changes proposed to the Neighbourhood Plan.
46	B. Hughes Woodgate Swanton Morley		Agree with policies 1 to 9 & 11 to 19 & Sustainability Appraisal Disagree with policy 10	Thank you for your support and your comments.
		Policy 2	Please state: - No development should be allowed on sites LP(098)14 or LP(098)16 unless or until	Comments noted. The delivery of these sites has a number of constrains linked to their location. Site LP(098)16 is unlikely to be

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			development of LP(098)13 has been undertaken.	developed without either of the adjoining sites due to access issues. Policy 3 identifies that development on sites LP(098)14 and LP(098)16 is to be in conjunction with site LP(098)13.
			- applications for development on any sites will not be granted solely on the basis of being included in the SMNP. As well as complying with policies in the SWNP and 'other' development plan policies, each application must be considered on its own merits and the needs of the parish existing at the time of application.	Comments noted. All planning applications are considered on their own merits and will need to comply with all planning policies or be able to justify why they should not comply.
		Policy 3	Yes, but only relevant if LP(098)14 & LP(098)16 are developed. It must not be assumed that they will be.	Comments noted. Policy 3 sets the requirement for development of these sites, as the landowners are promoting these sites. It does not guarantee that development will come.
		Policy 6	Yes, but please emphasize that no development to be allowed without a section 106 agreement being in place.	Comment noted. Not all development requires a section 106 agreement. Where one is required Breckland District Council will ensure it is in place and signed before granting planning permission.
		Policy 8	Yes but, in order to properly protect the Open Spaces please remove the condition: "unless it can be demonstrated outweigh the loss". Once an open space is gone it is irretrievable and must be	Comments noted. There are times when it may be appropriate to allow development on these sites if the benefit can be demonstrated to outweigh the loss. For example; it may be that in releasing a site for

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			protected in perpetuity.	development an even better, bigger or more suitable location is delivered as part of the conditions of that development.
		Policy 10	Doesn't go far enough - This implies that only four views looking away from the village are to be protected.	Comments noted. The four views listed have been identified by the Steering Group as the most important and warrant protecting. This does not mean there are other lovely views around Swanton Morley but these have not come forward in the consultation events.
			- this also implies the possibility of development to north and east of the village in wholly inappropriate areas. This ambiguity should be avoided.	Comments noted.
			- Provision must be included to protect ALL views looking outward, such as views to the south, the east and the west.	Comments noted. The views you are referring to, whilst beautiful views across open countryside, it is difficult to justify the significance of each view.
			- views towards the village must also be considered. The current Rectory Road development is an eyesore when viewed from Elsing Road due to its elevated position and the wholly inappropriate scale of the houses built.	Comments noted.
		Policy 12	Much more emphasis should be placed on item 2) in order to avoid the horrendous mix	Comments noted. All elements of the criteria are important and no one has more

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			of town houses that have landed in the village on the Rectory Road site.	importance than the other. Policy 12 requires new development to meet all the criteria.
			Architecturally, it is a predominantly urban development in a rural village and has too many differing styles and materials.	Comments noted. Design is always a difficult area to please everyone. The new houses use styles and materials already used in developments across Swanton Morley.
			English Heritage's concerns that the development would impact upon the visual setting of the church were ignored, hence the ruined view of the church from the east (there is now no possibility of viewing the church from the west).	Comments noted. The comments would not have been ignored by Breckland District Council; in determining the planning application Breckland District Council would have considered the concerns and balanced these with the positives the development would bring – this is in the context of the National Planning Policy Framework which starts from a point of presumption in favour of sustainable development.
			This, I would suggest, cannot be allowed to happen again so much firmer statements need to be included. Also, a requirement to plant trees to shield any development MUST be included, as well as retaining existing	Comments noted. Where possible a development would seek to retain trees and if removal is necessary it should seek to replant new trees.
			trees.	Development proposals include landscape plans and, where necessary, include screening, shielding and buffer zones.
		Policy 13	Yes, but, communal car parking is appropriate for a town, not for a village.	Comments noted. Communal parking areas in towns and villages can work very well they can also be very bad and not work. The location is usually key to ensuring success and

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				this will require assessment when each planning proposal and application is made.
		Policy 15	Yes, but remove choice from the developer: This is the village's plan and if an exact number of dwellings is not reached it should not be for the developer to choose to deliver the higher or lower number of bedrooms, but for the village.	Comments noted. There has to be a degree of flexibility for a developer to being their proposals together. The percentage ranges provide the requirements for any developer to work to whilst the range also give the flexibility provided the numbers proposed fall within the stated ranges.
		Policy 17	Yes, mention should be made that, although a long way off (but only 14 years), Robertson Barracks will allow a degree of commercial opportunities which should be encouraged when the time comes. However, the village should try to retain some control as heavy	Comments noted. The future of Robertson Barracks is of great concern to the community as a whole, but until the MOD start to confirm what they intent to retain and formalise plans it is not known what is opportunities exist.
			industrial units might need to be avoided and too rapid a growth might lead to Swanton Morley becoming a town in its own right. This not what the village might like in 2031.	You will see from the MOD comments (in reference number 26 above) that the MOD will seek early discussions above the future of the site with both the Parish Council and Breckland District Council in due course.
		Policy 19	Could this be broadened? Whereas we can only be concerned with traffic etc within the parish, if growth is too rapid and too great there may be impacts on the surrounding road infrastructure.	Comments noted. The Swanton Morley Neighbourhood Plan can only affect the Neighbourhood Area (parish of Swanton Morley) and set requirements relating to that area.
				It is not possible to seek to influence wider afield using the Neighbourhood Plan, other mechanisms will have to be use.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			The NCC deciding to widen or deviate any approach roads to Swanton Morley would probably not be welcomed by most of the village population	Your concern is likely to be realised when the Norwich Northern Distributor Road (NDR) is completed and open early in 2018 with more traffic likely to use Swanton Morley to transit between the A1067 Fakenham Road and A47 road.
		Overall, do you agree with the Neighbourhood Plan ?	Overall, the Neighbourhood Plan appears to be a clear and thorough document. (it does need copy editing as there are a few repeated words etc)	Comments noted. Hopefully the duplicates will have all been picked up in the final version of the Swanton Morley Neighbourhood Plan.
			At 1.3.3(iii)what is "excluded development"?	<ul> <li>Comments noted, to define 'excluded development as: - <ul> <li>a) Is a 'county matter' (schedule 1 of 1990 ACT) i.e. relating to minerals</li> <li>b) Any operation or class of operation relating to waste development that falls within Annex 1 to Council Directive 85/337/EEC i.e. Oil refineries, power stations, radioactive waste disposal, iron and steel smelting, asbestos operations, chemical installations, motorways, airports, ports and toxic and dangerous waste disposal.</li> <li>c) Development consisting wholly or partly of a national infrastructure project</li> </ul> </li> </ul>

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			There is some ambiguity in policies 2, 3 and 6	policies.
			Policy 10 is too loose.	Comment noted. This Policy related specifically to the four views.
			Policy 12 needs to be more emphatic in the architectural design of houses not simply no of bedrooms etc*.	Comments noted. The number of bedrooms is used to denote size whilst a way of understanding and matching needs and supply.
				The appearance of one and two bedroom dwellings and starter homes can be designed to be in keeping with rural village. For example, the external appearance could be of a large rural house but inside it is in fact two or four smaller homes.
			Policy 15 needs to be firmer and remove ambiguity.	Comments noted. See the comments above under Policy 15.
			*As stated above, the architectural design of any developments must be strictly controlled to avoid the imposition of inappropriate building styles. Many developments over the last 40 years have not been in sympathy with the village aspect of Swanton Morley and were far more appropriate for urban and suburban situations. Whereas apartments can provide single or two bedroom starter homes, they are not appropriate for inclusion in rural	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Sustainability Appraisal	village developments. They are an urban type of dwelling and must not be allowed. Yes, the Sustainability Appraisal exercise appears to have been completed satisfactorily. However, there is no mention of noise pollution or light pollution and could therefore be seen as incomplete.	Comments noted. Noise and light pollution are covered under Breckland District Council's Core Strategy Policy CP 9. Proposed action:- No changes proposed to the Neighbourhood Plan.
47	Swanton Morley Resident Completed at Consultation Event – no name or address given.		Agree with all 19 policies and Sustainability Appraisal.	Thank you for your support Proposed action:- No changes proposed to the Neighbourhood Plan.
48	Breckland District Council	General	It would be useful to understand whether the Neighbourhood Plan group have confirmed the anticipated timeline for the adoption of the neighbourhood plan. Within the document there is reference to both Breckland's emerging Local Plan and also use of policies within the Core Strategy and Development Control Policies DPD.	Comments noted. At this point in time it is too early to be able to be specific about the adoption of the Swanton Morley Neighbourhood Plan, which has only just finished its Pre-Submission Consultation (as per Regulations 14) and there are a number of steps the Steering Group will need to complete, including reviewing and assessing the responses received to the Pre-Submission Consultation and agreeing actions and amendments, prior to finalising the Swanton Morley Neighbourhood Plan and submitting it to Breckland District Council.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				Steering Group is working to an indicative timetable and would broadly expect to deliver to the following dates:-
				<ul> <li>May 2017: Submission to Breckland District Council of the Swanton Morley Neighbourhood Plan and supporting documents.</li> </ul>
				<ul> <li>June 2017: Breckland District Council to have started the consultation (publicise for 6-weeks prior to Examination) and finishes in July 2017.</li> </ul>
				<ul> <li>June 2017: Breckland District Council to appoint Examiner.</li> </ul>
				<ul> <li>21 July 2017: Independent examination commences.</li> </ul>
				<ul> <li>4 August 2017: Examiner's report on the Swanton Morley Neighbourhood Plan.</li> </ul>
				<ul> <li>11 August 2017: Breckland District Council to issue notice of referendum.</li> </ul>
				• September 2017: Breckland District Council to hold referendum.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				<ul> <li>September 2017 (day after referendum): Result of referendum declared and, if positive, Swanton Morley Neighbourhood Plan is 'made' and used when determining planning applications in the Swanton Morley Neighbourhood Area (subject to Government's Housing White Paper being passed in Parliament).</li> </ul>
				<ul> <li>September 2017: Breckland District Council formally adopt the Swanton Morley Neighbourhood Plan at the Full Council meeting or, if a Cabinet decision is required, the Swanton Morley Neighbourhood Plan goes to Cabinet on 17 October 2017 and on 2 November 2017 to Breckland District Council Full Council meeting for formal adoption of the Swanton Morley Neighbourhood Plan.</li> </ul>
				As Breckland District Council should be aware the Swanton Morley Neighbourhood Plan can only be adopted following a successful local referendum, which can only occur following the independent examination and a recommendation from the Examiner that it can proceed to referendum.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			These policies will be superseded by the Local Plan and this would lead to policies in the Neighbourhood Plan becoming out of date quickly.	Breckland District Council's failure to deliver the new emerging Local Plan within the expected timescale has been very frustrating for both the Swanton Morley Parish Council and Swanton Morley Neighbourhood Plan Steering Group. It has been necessary, therefore, to ensure the Swanton Morley Neighbourhood Plan aligns with the National Planning Policy Framework and Breckland District Council's adopted Core Strategy whilst being mindful to and referencing the emerging Local Plan that Breckland District Council are still working on to deliver.
				Breckland District Council's emerging Local Plan, once adopted, will only superseded the adopted Core Strategy and Development Control Policies DPD and related Local Development Framework documents. The adopted Local Plan will then be part of the Development Plan alongside the Swanton Morley Neighbourhood Plan and any other 'made' Neighbourhood Plans for the District.
		Whole Plan	It is noted that this is the first opportunity Breckland has had to make comments on the plan, as it has not been asked to comment on any previous draft plan.	Breckland District Council will be aware that their emerging Local Plan must align to existing policies, plans and programmes; including the Swanton Morley Neighbourhood Plan as this will be 'made' in advance of Breckland District Council's emerging Local Plan, the policies of which do not supersede the policies of the Swanton Morley

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				Neighbourhood Plan as they will be effective until 2037. Therefore, it is incorrect for Breckland District Council to say that the policies of the Swanton Morley Neighbourhood Plan will become out of date quickly.
				There has not been any previous Swanton Morley Neighbourhood Plan that Breckland Council could have commented on.
				It should be noted that Officers of Breckland District Council have been invited to participate with the development of the Swanton Morley Neighbourhood Plan but have not done so. Although Cllr. Gordon Bambridge, the Planning Portfolio Holder at Breckland District Council, did attend the Community Event and commented that he was impressed with the work and outcomes and posted on 15 January 2017 on his Facebook page
				"Attended the consultation launch of the Swanton Morley Neighbourhood Plan yesterday. Well done for the village for getting started on this, and the quality of all the questions you are asking your residents and others. I did not fill a questionnaire in as that would be quite inappropriate, but I was asked twice, so people on duty were up to the task they had.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				I now look forward to seeing the plan go through the system over time. A number of communities have decided to go along this route, and I hope that many more of our larger and medium size villages will do their own plans. You can get a grant from Central Government and this can be topped up by Breckland to help defray the costs. On the other end of the process Yaxham have completed much of the work on their plan and will be having a hearing before the Inspector at the end of this month."
				Comments noted. This has not been raised as an issue for anybody else reading the document.
			-	On the inside cover of the font page in larger text is a sentence to explain alternative formats available on request.
			Remove justification on the right hand side.	No request has been received for any "large print" or "another format".
			Referencing within the plan could be developed to make it much clearer what is being referred to e.g. make reference to the paragraph No, not just the document.	Comments noted.
			To aid the use of the document by the	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			examiner and planning inspectors.	
			Need to be more consistent when referring to organisations e.g. Both "Breckland District Council" and "Breckland Council" are used intermittently.	Any reference to Breckland District Council or Breckland Council in the Swanton Morley Neighbourhood Plan could not be misconstrued as referring to any other organisation other than Breckland District Council.
				It should be noted that in the first two paragraphs of Breckland District Council's response (see above) they have referred themselves as "Breckland District Council" and "Breckland" with other terms being used throughout their response. As Breckland District Council are in inconsistent in referring to themselves is it any wonder that others may use more than one name, as all the terms seem acceptable to Breckland District Council.
			Take a consistent approach when referring to organisations.	The Swanton Morley Neighbourhood Plan will be amended to only refer to Breckland District Council as Breckland District Council unless specifically referring to one of Breckland District Council's documents, in which case the terminology used in the document's title will be used.
				It is respectfully suggested that Breckland District Council should adopt a consistent approach in their naming of themselves in

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				documents and correspondence.
			The key is missing from a number of the maps e.g. what the lines represent etc.	Comments noted. Key to be added where required.
			Add the key where this is missing.	
			Given the stages of the Councils draft Local Plan review and recently published draft Local Plan viability Study, have the policies within the draft NP been considered against these along with the appropriate viability testing?	Comments noted. The Pre-Submission Version of the Swanton Morley Neighbourhood Plan started its Regulation 14 consultation on 12 <sup>th</sup> January 2017 whilst Breckland District Council's study on viability was issued on 14 <sup>th</sup> January 2017 and not published until 3 <sup>rd</sup> February 2017, therefore, making it impossible for the contains of the study to be considered.
			Provide evidence for the appropriate viability testing.	There is no requirement to test the Swanton Morley Neighbourhood Plan in relation to the study, which only makes scarce reference to Neighbourhood Plans.
				None of the policies contained in the Swanton Morley Neighbourhood Plan are considered to be unduly onerous on development.
				As Breckland District Council will be aware there are a number of factors in calculating viability. It is within Breckland District Council's control to adjust the variables to aid the viability of any given development.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Omission	While the use of photographs is welcomed, a number of them have no titles.	Comments noted. It is not necessary to add titles to all photographs. Where a photograph is part of the evidence or justification it is
			To assist the use of the document.	reference and explained in the text.
			Add a title to all the photographs.	
		Front Cover		Comments noted. Breckland District Council have already created a great deal of uncertainty with their emerging Local Plan; both with its content and failure to deliver on time. There is a degree of scepticism of when
			Consistency with the emerging Local Plan. (Also see comments regarding para 1.5.1 &	it will be delivered.
			para 7.1. Plan period to end in 2036 to align with the emerging Local Plan.	There is no need for the Swanton Morley Neighbourhood Plan to have the same plan period and there are some advantages for it to be different.
		Pages 1 - 28	policy section of the plan. Whilst setting the	Comments noted. It is felt important that the Swanton Morley Neighbourhood Plan should tell the story of Swanton Morley and give context to such a wonderful village to aid local residents and other readers of the Swanton Morley Neighbourhood Plan.
			Whilst not contradictory to regulations or guidance, refining the plan to highlight key points and drawing the reader to the neighbourhood plan policies will help to make the plan easy to read and therefore more effective.	All the information is relevant and essential to support the understanding and evidence the Swanton Morley Neighbourhood Plan. It is interesting to note that in Breckland District
				Council's Core Strategy and Development

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			The detailed supporting information could be placed in a separate document to form part of the evidence base.	Control Policies document the first policy of the Core Strategy is on page 28.
		Page 2	Welcome the availability of the plan in other formats.	Comments noted.
		Page 3, para 4, 2nd sentence	It is not technically correct to state that "this document will be submitted to Breckland Council for their consideration prior to being subjected to an independent examination." The document is submitted for further consultation to all consultees, along with other supporting documents.	
			Para 3.6.1 of the Plan outlines the correct approach – need to ensure a consistent approach is taken throughout the plan.	Comments noted.
			Amend to make clear that when the Neighbourhood Plan, and supporting documents, are submitted to Breckland Council they will be subject to further consultation for all.	The text will be amended to match that used in paragraph 3.6.1.
		Page 3, para 5, 2nd sentence	document as a "Local Area Plan". Currently Breckland Council has an "adopted" Local	Appraisal Scoping Report for reference to

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			It is important to use the correct names for documents, so not to cause confusion, and but also to use terminology that will not quickly date the plan, subject to when the plan is "made". (See comments re p21, para 3.8.2).	
			Amend "with Breckland Council's Local <b>Development</b> Area Plan it will be the starting point for deciding how future development should take place".	Comments noted and area will be removed.
		Page 6, Executive Summary	Not normally included in such a statutory document and includes terminology which will refer to the current consultation.	Perhaps Breckland District Council should consider including in their documents.
				The Executive Summary helps readers, especially local residents, to understand the Swanton Morley Neighbourhood Plan, its context and policy areas.
			Remove from Reg.16 version.	No, the Executive Summary will be updated at each stage and version of the Swanton Morley Neighbourhood Plan.
		Page 6, para 3, 2nd sentence – if retained		Comments noted. The suite of documents that Breckland District Council has produced and adopted make up the current Local Development Framework (LDF), which at some point will be replaced with the new Local Plan and associated document(s) that
				will include any 'made' neighbourhood plans, including the Swanton Morley Neighbourhood

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Local Plan) - a consistent approach needs to be taken.	Plan.
			Replace "Local" with "Development".	Amend to Breckland District Council's Development Plan.
		Page 8, para's 1.2.1/1.3.1		Comments noted. These are already included in the Swanton Morley Neighbourhood Plan Basic Conditions Statement.
			Move to Basic Conditions Statement for the Reg. 16 Consultation.	No, as they add context and aid the ability of the Swanton Morley Neighbourhood Plan to be read as a stand-alone document, as it is likely to be the only document most local residents read.
		Page 9, para 1.4.1	be more appropriate if these were moved. However, it would still be useful to make a	Comments noted, again these help local residents understand the constraints that the Swanton Morley Neighbourhood Plan is working to and is, therefore, very relevant to remain in this section and is not felt a duplication.
			Move to Basic Conditions Statement for the Reg. 16 Consultation.	No, although it should be noted that these are already included in the Swanton Morley Neighbourhood Plan Basic Conditions Statement.
		Page 9, para 1.5.1, 1st sentence	twenty years", not clear why the "plan	Comments noted. The plan period of the Swanton Morley Neighbourhood Plan is twenty years, as set out correctly in section

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			2036"?	1.5.1. Breckland District Council seems to have got their maths wrong (2017 + 20 = 2037).
			Amend date to "2017-2036".	No, as this is only nineteen years. See comments above.
		Page 9, para 1.5.2, 1st sentence		Comments noted, although the text does not say that the Swanton Morley Parish Council is responsible for monitoring.
			Breckland Council are looking to agree an approach and work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach. Text in para 7.6 is more appropriate.	
			Delete "and to monitor delivery". Or add ""and to <b>work with Breckland Council to</b> monitor delivery".	No, as Swanton Morley Parish Council do intent to monitor delivery.
		Page 10 -15, para 2.1- 2.6		Comments noted. Disagree; the context of Swanton Morley is important to appreciate the ambition and policies in the Swanton Morley Neighbourhood Plan.
			Move to an Evidence Basic Document for the Reg. 16 Consultation.	There is no need to create a separate document, as the evidence for the Swanton Morley Neighbourhood Plan is contained within the Plan itself or the other supporting documents (such as the baseline data in the

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				Sustainability Appraisal Scoping Report).
		Page 10, Map 2	This effectively duplicates Map 1, but also includes parts of other parish boundaries. It would be more useful showing a wider area. Would put the Parish area in context.	Comments noted although Map 2 is the Swanton Morley Parish and surrounding parishes while Map 1 is just the Swanton Morley Neighbourhood Area, which is also the parish boundary.
			Have a wider scaled map.	A new wider area map will be inserted to illustrate the position of Swanton Morley within Breckland District.
		Page 11 - 12, Photographs	It would be useful to clarify the date of the "modern" photographs on the right hand side.	Comments noted.
			Add date of "modern" photographs.	Text to be added to say "and recent view".
		Pages 19 - 21	Process and Key Steps – to avoid duplication it would be more appropriate if these were moved to the relevant document.	Comments noted. As per previous comments the inclusion of the text aids the understanding of the Swanton Morley Neighbourhood Plan; the processes and steps
			Move to Consultation Statement for the Reg. 16 Consultation to avoided duplication.	in its production.
		Page 21, para 3.7.1	This is not technically correct as there are other legal requirements.	Comments noted. Add details of plan making process.
			Para 3.7.2 outlines the requirements, which go beyond meeting the basic conditions.	
			Delete as correct situation identified in para	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			3.7.2 below.	
		Page 21, para 3.7.2 a) & b)		Comments noted although the National Planning Policy Framework does not refer to these Acts 'as amended', therefore, it is not necessary.
		Add "as amended" after each piece of legislation.		
		Page 21, para 3.7.2 a) & c)		Comments noted. As this section is a guide to the overall process, not a technical 'blow-by- blow' instruction, to aid the understanding of the Swanton Morley Neighbourhood Plan, as
			In a) make reference to the relevant paragraph In c) make reference to the relevant piece of legislation, schedule & paragraph.	per previous comments. The inclusion of these
		Page 21, para 3.8.2	Currently, it is not strictly correct to state that "part of the statutory 'development plan' for the area and, together with the Local Plan,". The amended wording will depend on whether the Neighbourhood Plan is "made" before or after the emerging Local Plan is "adopted".	Comments noted. With the uncertainty of Breckland District Council's ability to deliver the its emerging Local Plan it would be inappropriate to link the Swanton Morley Neighbourhood Plan to either.
			As stated, in para 5.5.1 Breckland Council has an "adopted" LDF, not Local Plan.	Breckland District Council will be aware that the Local Development Framework forms part of the Development Plan. The emerging Local Plan, once adopted, will only superseded the adopted Core Strategy and Development Control Policies DPD and related Local

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				Development Framework documents.
				The adopted Local Plan will then be part of the Development Plan alongside the Swanton Morley Neighbourhood Plan.
			If the NP "made" before the emerging Local Plan is "adopted", amend to: "part of the statutory 'development plan' for the area and, together with the Local <b>Development</b> <b>Framework</b> , become the starting point".	Comments noted. Amend wording to "Applications for planning permission must be determined in accordance with the Development Plan.
		Page 25, para 5.2.1	It is not technically correct to state that Breckland Council has an "adopted Local Plan", as the documents referred to form part of the Local Development Framework.	•
			Also need to be consistent with referencing of the documents.	
			As stated, in para 5.5.1 Breckland Council has an "adopted" LDF, not Local Plan.	Amend to 'Local Development Framework'.
			Delete reference to "Local Plan" and replace with " <b>Local Development Plan</b> ".	Add 'December' to the text.
			Amend" 1st document to " <b>December</b> adopted 2009)" to be consistent with the other documents in para 5.2.1 & 5.2.2.	
		Page 27, para 6.8	What is being done about those "issues falling outside the remit of the planning system?"	Comments noted. For specific actions residents have been directed to the Clerk of

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				Swanton Morley Parish Council, whilst suggested projects have been included on the projects list.
			Would be useful to clarify the situation.	Text will be added to explain what has happened.
		Page 30, para 6.20	The reference to the national and local planning documents supporting Policy 1 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 30, Policy 1 Protecting the identity of Swanton Morley	This makes reference to settlement limit – it is not clear whether this refers to the "settlement boundary" or areas beyond this where there may be development. Need consistent wording with the Breckland Development Plan to aid clarity and understanding of where the policy applies. N.B. "Rural exception sites" may still be permitted. Reword policy using consistent terminology.	
			e.g. amend "settlement limit" with "settlement boundary".	
		Page 31, para 6.24		Comments noted. It is not the place of the Swanton Morley Neighbourhood Plan to

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			making process.	explain or justify Breckland District Council's approach to plan making or the confusion
			This should be made clear to reflect reality.	that has caused.
		Page 33, para 6.33	has been updated to provide a mid-year	reflect the five year housing land supply published in November 2016. Although it should be noted that Breckland District Council's approach in using the Objectivity
			Housing Land Supply Statement dated 30.09.16.	
				Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
		Page 36, para 6.40	Bullet Point 4 – an incorrect title for the Strategic Housing Market Assessment has been is used.	
			List relevant paragraphs or policies.	
			Change 'Centre Norfolk' to ' <b>Central</b> <b>Norfolk'</b> . This should also be checked for other sections.	

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		Page 36, Policy 2 Residential Development Sites	The policy justification does not make it clear why these sites have been chosen over other sites which have been promoted. This is an additional allocation in comparison to the emerging Local Plan. Whilst this can occur under the "Basic Conditions", it is not clear how alternative options have been assessed.	Comments noted. Paragraphs 6.22 to 6.39 explains the process, where the site options came from (paragraphs 6.25, 6.30 and 6.32) and how they have been selected (paragraphs 6.26 to 6.30, 6.36, 6.37 and 6.38).
			-	See paragraph 6.38 for full list of sites considered, as proposed by Breckland District Council.
			Show assessment of alternative site options.	See results in paragraph 6.38. Add details in an appendix.
			Also it is not clear whether consideration has been given to the infrastructure capacity to support this additional level of growth. This needs to be clarified.	Comments noted. Site specific requirements are listed in Policy 3 of the Swanton Morley Neighbourhood Plan. The more generic infrastructure requirements would need to be identified and assessed by Breckland District Council as part of any planning application relating to these sites.
			The policy also does not clarify how many dwellings the sites are proposed for. Clarify the level of housing allocation proposed for each site.	Comments noted. The number of dwellings has not been proposed, although the sites could be seen to accommodate up to c100 additional dwellings (using a standard of 20 dwellings per ha) although in meeting requirements of Policy 3 of the Swanton Morley Neighbourhood Plan may reduce this number.

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			Wensum SSSI/SAC protected site and could be linked for recreation to the Wensum Way. Therefore impacts to the River Wensum SSSI/SAC arising from additional housing and population size needs including - indirect increased recreational pressure will need to be considered. This is inferred through the wording "need to comply with other	Comments noted. The inclusion of the 'need to comply with other development plan policies' seems specific enough for Breckland District Council to apply the relevant and appropriate policies to any future planning application relating to these sites without the need to actually list the policies. The danger of producing a list is that a policy could be missed or has the potential of not including the policies of the emerging Local Plan, once adopted.
			in proximity to the River Wensum SSSI and SAC and is linked by the Wensum Way.	
			requirements of other development plan policies, and the protection of designated	As stated above, this addition text is not required as it is already a requirement that Breckland District Council Planning Officers will assess against any future planning application.
		Page 40, para 6.57	The reference to the national and local planning documents supporting Policy 3 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.

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			List relevant paragraphs or policies.	
		Page 41 - 42, para 6.60 - 6.72	Housing authorities are required by the Housing Act 1996 s166A (as amended by the Homelessness Act (1996) and the Localism Act (2011) to have an allocation scheme for determining the priorities and defining the procedures to be followed in allocating affordable housing accommodation. The Allocation Policy must set out who can	Comments noted. Whilst it is appreciated that there is high demand across the district for affordable housing although the approach that priority for some affordable housing on all new developments will be given to local people; as other District Council's have done (such as Broadland District Council).
			access the housing register and how accommodation is allocated in the District.	There is nothing preventing Breckland District Council, through the Swanton Morley Neighbourhood Plan, having an allocation for Swanton Morley as detailed in Policy 4 Swanton Morley Neighbourhood Plan. This is a policy delivering at a more localised level with more specific and targeted outcomes that the local community wants. Exactly the goal of the Localism Act 2011.
			All applicants who are accepted onto the Housing Register will have their application assessed and awarded a priority band based on an assessment of their housing need in accordance with the allocations scheme. This is to ensure that the Council meets its legal obligations as set out in the Housing Act (1996) amended by the Homelessness Act (2002).	Comments noted. The process described is still appropriate and would be the delivery mechanism; with the requirement that people are on the Breckland District Council's Housing Register. Where the request for housing is specific to Swanton Morley then their connection to Swanton Morley needs to be understood. This is exactly the same process that other District Councils use albeit on a district wide basis.
			The Councils Allocation policy is set in	Comments noted. As per response above this

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		th To O	ccordance with the legal requirements and nen approved and agreed by the Council. add further local connection criteria utside of the policy would not only be ontrary to the Councils allocation policy but	relates to the delivery for affordable homes in Swanton Morley; it is not contrary but supplementary in enabling local people to access affordable homes.
		a	uthorities must conform to.	Comments noted. Rather than being seen as 'contrary' Policy 4 of the Swanton Morley Neighbourhood Plan should be seen as ancillary or supplementary to Breckland District Council's policy and enhances it at a local level.
		R A p	easonable Preference By law Local uthorities must award 'reasonable	Comments noted. Policy 4 of the Swanton Morley Neighbourhood Plan does not stop Breckland District Council from excising its requirements of 'reasonable preference', in fact a few of these categories are the very reasons that people in the local community would be seeking housing and find themselves on the housing register.
			<ul> <li>Applicants who are owed a duty by any Housing Authority under the Housing Act 1996 section 190 (2), 193 (2) or 195 (2) or the Housing Act 1985</li> </ul>	Paragraph 6.70 recognises Breckland District Council's statutory duty to house those in need.
			section 65 (2) or 68 (2), or who are occupying accommodation secured by any such Authority under section 192 (3) Applicants who are occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing	The 'local connection' already happens on rural exception sites where a small development is built to meet a local housing needs. Priority for affordable housing is given to people with a local connection to the parish /town that the development is built in.

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			<ul> <li>Conditions</li> <li>Applicants who need to move on medical, support or welfare grounds, including grounds relating to disability</li> <li>Applicants who need to move to a particular locality in the district of the Authority where failure to meet that need would cause hardship to themselves or others</li> </ul>	The cascade for allocation of properties is set out and enhanced to give great clarity in Policy 4 and Policy 5 of the Swanton Morley Neighbourhood Plan, which should be attached to the legal agreement for the site. The cascade gives priority to households that have a strong local connection to the parish of Swanton Morley. This means that local people benefit from affordable housing provision on these sites, when the property is first let and when properties become vacant. It should also be noted that not all affordable
				housing can be allocated with the Local Letting Policy 4 of the Swanton Morley Neighbourhood Plan because of Breckland District Council's statutory duty to house some people and, therefore, needs new affordable housing to meet these duties. Breckland District Council also needs to make sure that people can move between properties or out of temporary accommodation and provide people with a home.
			light of comment on Policy 4, delete all ferences to "A Local Letting Policy".	No. The Local Letting Policy is seen as a real asset to the local community and a positive outcome as new development comes to Swanton Morley.
				This means when a property is allocated under Policy 4 of the Swanton Morley Neighbourhood Plan the cascade is used to

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				allocate the property to households on Breckland District Council's housing register. For example, if an affordable home is built in Swanton Morley and allocated with a Local Letting Policy, somebody on the housing register in the low or medium band in Swanton Morley would be prioritised above somebody who lived outside of Swanton Morley in the high need band on the housing register.
		Page 41 6.60	Average is a very vague term and no reference is given for the figures used. Figures may be subject to challenge from those who disagree. Specify which type of average has been used Provide reference for figures	referenced. Figure was provided by Breckland District Council and quoted by Breckland District Council in the Housing Needs Survey Report for Swanton Morley produced by Breckland District Council in
		Page 41 6.62	Remove comment about local people unable to access the dwellings. Local people on the housing register were able to bid for these homes in the same way as anyone else on the housing register. Remove comment or rewrite to reflect that homes were let to people in highest priority.	Comments noted. The statement is correct. No one from the local community, despite Breckland District Council identifying 17 people in need in the Housing Survey, was deemed a high enough 'priority' to be able to access any of the affordable housing at Rectory Road. This is why there needs to be an element of affordable housing firstly available to local people of Swanton Morley.

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		Page 42 6.68	An amendment is required regarding the number of affordable homes. To provide 34 affordable homes assumes firstly that the policy will remain unchanged at 40%, and secondly that no affordability issues are identified on any of the 3 sites. Reflect that a maximum of 34 affordable homes will be delivered, subject to onsite viability, and to policy DC4 remaining unchanged throughout the life of this document.	Comments noted. It is current Breckland District Council's policy, therefore, it seems a reasonable assumption to calculate the possible number of affordable homes based on Breckland District Council's policy. Obviously, should Breckland District Council's policy requirement change or viability be an issue in delivery of the site then Breckland District Council will alter and adjust their requirement (as done as part of the determination of any planning application or subsequent request to change a planning condition).
			Also this is not consistent; it suggests that local policy is "up to 33%", but 33% in Policy 4. The text needs to be consistent with the policy. Delete text in relation to comments on Policy 4 below.	Comments noted. The actual number should be based on the identified need from Breckland District Council's Housing Register with the 'local connection'. This number will be up to a maximum of 33% (based on the local need). Add more explanation to the text.
		Page 42 6.69	Explicit clarity is required that households must have been accepted onto Breckland's housing register at the time of allocation. Make this explicit both in text and any policy, subject to comments on Policy 4 below.	Comments noted. Whilst it is implicit that households would be on Breckland District Council's housing register (as per the Ambition statement in paragraph 6.73) this will be added to both text and to Policy 4 of the Swanton Morley Neighbourhood Plan.
		Page 43,	The reference to the national and local	Comments noted. The details of specific

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	para 6.75	planning documents supporting Policy 4 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	paragraphs are contained within the Basic Conditions Statement.
		List relevant paragraphs or policies, subject to comments on Policy 4 below.	
	Page 40, (on page 43) Policy 4 Local Lettings	Paragraph 47 (of the Allocations Policy) requires local planning authorities to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Policy DC4 of the Councils adopted plan fulfils this. Also paragraph 50 of the NPPF requires LPAs to ensure that plans deliver a wide choice of high quality homes and create sustainable, inclusive and mixed communities.	Comments noted. Already included in the Central Norfolk Strategic Housing Assessment 2015 and the Objectively Assessed Need will be these households who will be able to qualify under Policy 4 of the Swanton Morley Neighbourhood Plan as part of Breckland District Council's requirement to fulfil this identified need.
		It is also important to note that the evidence used to inform the local lettings policy and percentage requirements was under taken to identified housing need in the area in terms of providing a potential rural exception site. As per the paragraph 54 of the NPPF rural exception sites allow affordable housing to be provided in rural areas (in perpetuity) on sites that ordinarily would not be permitted for development to meet specific identified rural housing needs. This often allows housing needs that go beyond the statutory housing definition of housing need to be met-giving	Comments noted. The purpose of the Housing Need Survey Report for Swanton Morley was to establish if there is a local housing need in Swanton Morley parish, and if so, the extent of this need. This information can then be used to assess what type and tenure of homes would best suit local needs. Exception Sites are a useful mechanism for the delivery of additional affordable homes, although they do rely on a landowner being receptive to the provision of land at potentially a lower value than may be

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			those with a local connection but lower level of housing need when assessed against the statutory criteria set out above a greater opportunity to access affordable housing in the village/parish.	
			the discretion allowed in terms of rural exception model has been confused with	Comments noted. There is no confusion. The approach taken in Policy 4 of the Swanton Morley Neighbourhood Plan is an initiative solution to resolve a difficult problem for all communities and councils. The 'Local Letting' approach is one that has successfully been used by Broadland District Council, who has incorporated the policy within their district wide policies and does not conflict with their statutory requirements or ability to meet housing needs. Technically, Breckland District Council requirement to meet the fully objectively assessed need (FOAN) is incorrectly quoting more recent numbers derived from the Central Norfolk Strategic Housing Market Assessment 2015 rather than those that underpin the adopted Core Strategy.

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			The inclusion of the local lettings criteria is in conflict with policy DC4 of the adopted Local Plan which seeks to ensure that Affordable Housing is secured to meet the affordable housing needs of Breckland as identified in the Strategic Housing Market Assessment.	Comments noted. Although Policy 4 of the Swanton Morley Neighbourhood Plan is not at odds with the Local Development Framework (as per Breckland District Council's earlier comments regarding page 3, paragraph 5, 2nd sentence) currently Breckland Council has an "adopted" Local Development Framework (LDF) and not an "adopted Local Plan". Therefore, policy DC4 is part of the Local Development Framework. For consistency, as requested by Breckland District Council, it should be recognised that the Strategic Housing Market Assessment being referred to is the earlier assessment and not the Central Norfolk Strategic Housing Assessment 2015.
			Delete policy and supporting text - not only does it prevent the Local Authority from complying with legal requirements it also is in conflict with the adopted Development Plan.	Comments noted. Policy 4 of the Swanton Morley Neighbourhood Plan does not prevent Breckland District Council complying with the legal requirements, as evidenced by the approach Broadland District Council has taken. Rather than being in conflict Policy 4 of the Swanton Morley Neighbourhood Plan enhances that Development Plan and provides an elegant local solution by taking Breckland District Council's policy to a lower level.
		Page 44 6.79	In the context of DC5 'local' is the parish or adjacent parishes with need.	Comments noted. The explanation seems at odds with policy DC5, as the policy sets out

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				the requirement for "a proven need in the parish" – not adjacent – and, therefore, it would be appropriate for 'local' to relate solely to the parish and the proven need that justified the Exception Site.
			Amend to reflect this.	Policy 5 of the Swanton Morley Neighbourhood Plan does not need to be amended as it sets out and provides additional clarity to the application of policy DC5 of the Core Strategy and Development Control Policies Document. Removing the ambiguity that seems to currently exist and the possibility of future challenge.
		Page 44 6.80	Local support is normally a pre-requisite; however the parish council cannot be given a veto.	Comments noted. Confusion how Breckland District Council would establish 'local support', as this is not set out in the policy.
			Amend to reflect this.	As any Town/Parish Council are recognised as the 'qualifying body' in the Localism Act 2011, it seems reasonable, in the absence of any other mechanism to make use of their status to assist Breckland District Council in ensuring there is 'local support'.
				There is only positive reasons why Swanton Morley Parish Council should be included as part of the decision making process for the parish of Swanton Morley; as they are able to apply local knowledge to the decision making process.

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				Policy 5 of the Swanton Morley Neighbourhood Plan is seen as locally enhancing Policy DC5 of the Core Strategy and Development Control Policies Document and its application. Removing the ambiguity that seems to currently exist and the possibility of future challenge.
		Page 45, para 6.83	The reference to the national and local planning documents supporting Policy 5 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 45, Policy 5 Affordable Housing on	The policy refers to Core Strategy Policy DC5 and would therefore be out of date once the new Local Plan is adopted.	Comments noted. Policy 5 of the Swanton Morley Neighbourhood Plan refers to the current adopted policy.
		Exception Sites	To ensure the policy does not become out-of- date quickly.	If/when Breckland District Council are able to complete the emerging Local Plan and supersede Policy DC5 of the Core Strategy
			Delete policy.	and Development Control Policies Document with a new policy on Affordable Housing on Exception Sites; that new policy will need to confirm with the Policy 5 of the Swanton Morley Neighbourhood Plan, and all other policies in the Swanton Morley Neighbourhood Plan. Therefore, Policy 5 will be effective for the full planned period until

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				2037.
		Policy 5, Criteria a).	It is the legal responsibility of the Breckland Council, as the Local Planning Authority to make this decision, not the Parish Council. It is recommended in the first instance that the policy is not progressed as it is not implementable.	Comments noted. It is for Breckland District Council to determine planning applications. In so doing, Breckland District Council will consider planning policies, such as National Planning Policy Framework, Local Development Framework and the Swanton Morley Neighbourhood Plan.
			We would be happy to work with the Parish to design a policy that can be implemented.	There is no reason, and one has not been given, why Breckland District Council could not easily and simply implement Policy 5 of
			Delete policy.	the Swanton Morley Neighbourhood Plan. This is no justification to delete this policy.
				It is for Breckland District Council to apply all the policies in the Swanton Morley Neighbourhood Plan, once 'made', when determining planning applications in the Swanton Morley Neighbourhood Area and Swanton Morley Parish Council are looking forward to working with Breckland District Council to implement.
		Policy 5, Criteria b).	Whilst we support a local connection criteria for the purposes of rural exception sites, the wording used in the actual criteria needs more clarification for the purposes of allocation.	Comments noted. It is unsure why more clarification is required, although are happy to provide any assistance that Breckland District Council requires.
			For example how is 'close family' defined?	The wording is "close family or relatives" which

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				has clear definition in the any dictionary. For example; relative as a noun is defined as a person connected by blood or marriage, and it is thought this should including Civil Partnerships. Synonyms may help: relation, member of someone's/the family, one's (own) flesh and blood, next of kin, kinsman, kinswoman, family, kin, kith and kin, kindred, folks, kinsfolk.
			What is meant by other residents - does this include those not in housing need?	Comments noted, although criteria (b) does not mention 'other residents'.
				If reference is being made to criteria (e) then it is clear that this relates to "Other residents of Swanton Morley parish." This means any resident of Swanton Morley parish who does not meet the listed criteria of (a), (b), (c) and (d).
			What is defined as work - does this include voluntary work of say 2 hours per week or is paid employment?	Comments note. The intent is people who are employed to work in Swanton Morley. Therefore, "employed" will be added to help the policy definition.
			It also needs to be clear in the policy that allocations will be made to those in housing need and with a local connection to the parish not just based on local connection.	Comments noted. It is necessary for people to be on Breckland District Council's housing register to qualify, as stated in 6.81, although the local connection cascade would drive the allocations for Exception Sites and the Local Letting Policy 4 of the Swanton Morley Neighbourhood Plan. Add text to explain the

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				requirement to be on Breckland District Council's housing register.
			It is noted that by requiring a connection with Swanton Morley in perpetuity this effectively negates the lower orders of the cascade in Policy 4. This will have the effect of making it impossible to obtain lending on properties built under DC5.	Comments noted. It is not intended to negate any element of the cascade, instead the cascade is used to define the local connection to Swanton Morley but if there is not a local need then neighbouring parishes followed by any Breckland resident could access one of these dwellings.
				It is unclear how Policy 4 of the Swanton Morley Neighbourhood Plan changes any ability to obtain lending as DC5 already states "exclusively for local need, in perpetuity" under its criteria (c).
		Page 46, para 6.89	Aside from the fact that this paragraph contains an opinion, without any supporting evidence, such text is not appropriate for a statutory planning document. Delete from " There are examples"	Comments noted. Text will not be changed. Paragraph 6.91 gives detail of one such example and why Swanton Morley Parish Council see it as so important that they are a signatory to the Section 106 agreements to ensure community benefits are delivered
				appropriately through planning gain.
		Page 46, para 6.90 & 91	Aside from the fact that this paragraph contains an opinion, without any supporting evidence, such text is not appropriate for a statutory planning document. See comments on Policy 6 below.Delete	Comments noted. Text to remain as it is factually correct and not an 'opinion'. This is evidenced through the letter of apology received by Swanton Morley Parish Council from Breckland District Council in relation to the described event in paragraphs 6.90 and

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			whole paragraph.	6.91.
		Page 48, para 6.97		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 48, Policy 6 Delivery of Planning Obligations	appropriate obligations are secured to	Breckland District Council does not welcome the support and assistance being offered by Swanton Morley Parish Council, their local knowledge, proximity and vested interest to see the best delivery of community benefit,
			authority under the Town & Country Planning Act 1990 and cannot therefore enter into a legally binding planning obligation, without Breckland Council's agreement. Also there is	Comments noted. Breckland District Council seem to have misunderstood Policy 6 of the Swanton Morley Neighbourhood Plan as the Swanton Morley Parish Council is seeking to work alongside Breckland District Council and support them in the delivery of planning

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			Feedback, to support this approach. We will be happy to design a policy with you where the Parish would be responsible for the delivery of particular local infrastructure.	obligations.
			Delete Policy.	
			Whilst the involvement of the Parish Council (PC) in a consultee role is to be encouraged, it is important that roles and responsibilities are not misunderstood.	Policy to remain. The Swanton Morley Parish Council is keen to be more involved with the delivery of local community benefits. The commitment from Swanton Morley Parish Council is clear through the inclusion in the
			Provide a commitment to co-operate with the LPA.	Swanton Morley Neighbourhood Plan.
		Page 49 para 6.100	Higher Level Stewardship is not an accolade but an agreement for money to manage land for biodiversity, recreation or farming depending on the details of the agreement. Accuracy.	Whilst Breckland District Council may not see, in their opinion, Natural England's trust to provide the required level of stewardship as an accolade Swanton Morley Parish Council is immensely proud to have this trust and takes very seriously its role in managing this beautiful area.
			Amend "Mill Common; has gained the accolade of Higher Level Stewardship from is managed under a Higher Level Stewardship agreement with Natural England whereby…".	There is no need to make any amendment.
		Page 49, para 6.102, 3 <sup>rd</sup> sentence	"In accordance with national planning guidance" It should be made clear which guidance and paragraph is being referred to?	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.

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			To aid clarity. Add the relevant reference.	
		Page 50, para 6.104, 1 <sup>st</sup> sentence	needs to be developed to make it clear what is being referred to.	Comments noted. Although it should be noted by Breckland District Council that the correct name and date of the document is "Breckland District Settlement Fringe
			To aid clarity.	Landscape Assessment (July 2007)" as per paragraph 6.119. and not as detailed in
			Amend as follows: The <b>Breckland District</b> Landscape Character Area (May 2007). Sensitivity Assessment, undertaken by	Breckland District Council's response document.
			Breckland Council, is an evaluation of the [or add here] Landscape Character area around Swanton Morley".	The text will be amended to reference the document and its date. "Breckland District Settlement Fringe Landscape Assessment (July 2007)"
		Page 52, 6.116	Reference to appendix 3; the information is actually in appendix 2.	Comments noted. Amend to Appendix 2.
			To ensure accuracy. Amend to refer to appendix 2.	
		Page 52/3, para 6.119	The reference to the national and local planning documents supporting Policy 7 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Policy 7 Local Green	· · ·	Comments noted. The Swanton Morley Neighbourhood Plan seeks to designate all

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		Spaces and Appendix 2	as open space and as such are included with the SWNP. However, the site on Middleton Avenue, this is currently under review re its allocation as open space. Therefore, we would not want this site shown as open space within the SWNP. To 'make up' the provision - BDC would like to put forward 2 separate sites to be used in place of the site at Middleton Avenue.	three valuable areas as 'Local Green Spaces'. It seems a little strange as all three areas are classed as open space and should be afforded the additional protection the local community is seeking.
			All 3 of these sites are currently classed as open space in the Breckland local plan/policy map.	
			The 2 proposed sites are an additional area on Gray Drive and the outer area of land at Thompson Close, shown edged red on the attached plan. If these sites were agreed as a replacement for the site at Middleton Avenue it would mean that all open space/local green space is consolidated within the central areas of the two housing estates where these sites are based and not at the outer edges.	
			The NPPF at paragraph 77 requires local green space designations to be demonstrably special to the local community. It is not clear either in the reasoned justification or within the appendix	Comments noted. Table 8 in Appendix 2 provides the details associated with each area, their relatively small size and how each is special and valued by the community.
				This provides the specific detail, evidence and rationale to illustrate how each open green

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			them special to the local community.	space fully complies with the requirements of the National Planning Policy Framework.
			To ensure compliance with paragraph 77 of the NPPF.	
			Expand information to meet the requirements of paragraph 77 of the NPPF.	
		Page 53, para 6.123, 2nd sentence	It would help the reader if it was made clear where table is located.	Comments noted, although it is felt that the reader of the Swanton Morley
		2nd semence	Add "See table 2 <b>(below on the next page)</b> ".	Neighbourhood Plan would naturally turn the page and look on the following page for Table 2.
		Page 55 para 6.129		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 55, Policy 8 Protection of Open Space	The Local Development Plan does not allocate School Playing Fields as Open Space.	Comments noted. The Swanton Morley Neighbourhood Plan can choose to allocate the School Playing fields as open space and does so.
			Remove site 10.	
			of areas of open space, including areas at Robertson Barracks (Sites 14, 15 & 16). Whilst	Comments noted. As there is are 237 existing homes at Robertson Barracks there is a requirement for open space for the families and children who live there. The Swanton

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			slight surplus in outdoor sports facilities	Morley Neighbourhood Plan would like to see these areas recognised as open space for these families that currently make use of them. Current MOD plans have identified the disposal of the site in 2031. This is alone way off and the world is a changing place with the effects of 'Brexit' unknown at this time; plans may change.
			Therefore a masterplan approach for the site in the future is considered to be a more appropriate approach.	Comments noted, although the appropriate approach should be decided upon once a future use has been identified.
			the loss of open space unless it can be	
			Review designations and evidence for allocation of sites in light of NPPF (para 74). Remove sites 14, 15 & 16.	Sites 14,15 and 16 are to remain within Policy 8 of the Swanton Morley Neighbourhood Plan.
				Comments noted. Policy 8 of the Swanton Morley Neighbourhood Plan is not contrary to

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			can be demonstrated that the benefit to the local community outweighs the loss. This is contrary to paragraph 74 of the NPPF, which provides a criteria based approach for the loss of open spaced.	paragraph 74 of the National Planning Policy Framework; it is complementary. The criteria will still to be used from the National Planning Policy Framework but at a local level it will also need to demonstrate that the benefit to the local community outweighs the loss. The
			The basic conditions require neighbourhood plans to have appropriate regard to national policy. To ensure compliance with paragraph 74 of the NPPF.	benefit could be those all or some of the elements listed with the criteria in paragraph 74 of the National Planning Policy Framework although it may be that the local benefit is derived and demonstrated in another way.
			Remove policy or amend to comply with above.	Comments note although it should be noted that the areas identified under Policy 8 of the
			Comments made in relation to Policy 7 re Middleton Avenue, also apply here.	Swanton Morley Neighbourhood Plan are not seeking designation as "Local green Space" and, therefore unlike Policy 7 of the Swanton
			Amendments made in relation to Policy 7 re Middleton Avenue, also apply here.	Morley Neighbourhood Plan, is not required to meet the requirements of paragraph 77 of the National Planning Policy Framework.
		Page 57, para 6.136	The reference to the national and local planning documents supporting Policy 9 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Paragraph 6.140	Use of the wording <i>'historic development'</i> may lead to confusion with the historic environment.	Comments noted. To avoid confused the text will be amended to "existing development".

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			To avoid confusion with the important elements of the historic environment, which are subject to statutory protection.	
			Replace words 'historic development' with <b>'past development'.</b>	
		Page 57, Policy 9 Management of Open Space	Our preferred option is that it transitions to the parish council or a management company; however this would be dependent on whether this is legally allowed in relation to any other agreements, i.e. section 106. Currently BDC are not adopting open space and the majority are or have been transferred to the local town/parish councils.	Comments noted. Whilst the approach described by Breckland District Council in their response may be option they are currently following (although not policy), the adopting of open space by Breckland District Council is something it may choose to do in the future.
			Remove criteria b).	Options (b) and (c) are alternatives that any developer may use if a Developer decides not to use option (a). Should Breckland District Council decide that it does not want to adopt is a decision for Breckland District Council.
				Policy 9 of the Swanton Morley Neighbourhood Plan requires the Developer to demonstrate how green infrastructure will be looked after for future generations.
		Page 58. Para 6.144 and 6.145	Noted that protected sites applicable to Swanton Morley are mentioned. However there seems to be no specific policy relating	Comments noted. The River Wensum is already afforded a very high level of protection. To seek further protection or

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			to the protection and conservation of these sites although it is inferred by the ambition of the plan to protect the natural environment and countryside.	designation would be seen as unnecessary duplication and not necessary.
			NPPF. Biodiversity 2020.	
			This may not be an area that would have specifically been brought up by the parish and public. The overarching planning policies for Breckland will have specific policies relating to the protection of protected sites and the intention is within the NP document.	
		Page 59 para 6.155	The reference to the national and local planning documents supporting Policy 10 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 57, Policy 10, Important Views	Needs more detail and consideration in terms of analysis of their importance and subsequently what features areas need to be protected. More detailed or smaller scaled plan showing the views; or site specific plans showing the location and extent of views.	Comments noted. The context of the views identified is listed in paragraphs 6.139 to 6.145, while paragraphs 6.147 to 6.152 provides the detail about each of the four views, paragraph 6.153 sets the ambition of the policy and paragraph 6.154 demonstrates the community support.
			Not clear on the extent and scope of those important views. Difficult to interpret and limit it its ultimate success.	Each of the four views has a photograph to illustrate its importance and Map 9 identifies

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Clearer plan and graphic image showing the splay of the views across the area of concern. Set out what is important within each of these individual views.	the location.
		Page 60 Map 9	separate views which are being referred to in the policy.	Map 9 identifies where each of the four views are located and the direction of the view. A new Map 9 will be inserted removing the arrows and using 'viewpoint' indicators and an enlarged section to help distinguish between view 2 and view 3.
		Page 63 para 6.158, 2nd sentence	It should be made clear which NPPF paragraph is being referred to. Refer to relevant NPPF paragraph.	Comments noted. Add to text Section 11 paragraph 109.
		Page 64, para 6.163		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 66, para 6.173		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.

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			policies.	
			List relevant paragraphs or policies.	
		Page 69, para 6.181		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 69, Policy 13 Parking	This conflicts with the approach to encourage more sustainable modes of travel by the stick approach - limiting parking provision.	Comments noted although the view taken by Breckland District Council in seeking to limiting parking is 'out of date' and is generally accepted that as an approach it does not work. The maximum levels is considered inappropriate and abolished, while the National Planning Policy Framework, in paragraph 39, sets out the key areas that should be taken into account when setting parking standards.
			•	Comments noted. The percentages have been 'rounded' automatically by excel software which has resulted in the total number adding up to 101%.
			Needs further consideration and justification for the approach taken having regard to evidence; policy guidance and best practice in design.	Breckland District Council are reading the graph incorrectly, Swanton Morley has the highest percentage, of the comparison group, of 3 or more vehicles per household

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				with 11% against 10% for Breckland and the national figure for England of 7%. Highlighting the need, in the absence of alternative sustainable transport modes, the need to provide provision for off-street parking to prevent the street screen being dominated by parked cars and vans.
				The 2011 Census illustrates that Swanton Morley has significantly more vehicles per household at all levels when compared to the comparison group; evidencing the issues with high car dependency and sustainable transport modes.
		Page 71, para 6.190	The reference to the national and local planning documents supporting Policy 13 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	
			List relevant paragraphs or policies.	
		Page 71, Policy 14 Flooding	the evidence including Community	Comments noted. Policy 14 of the Swanton Morley Neighbourhood Plan does follow the approach the community is seeking; as local residents seek to infrastructure expanded with new development, including drainage.
			The purpose of the text is to justify the approach taken in the policy.	Sections 6.186 and 6.187 explain how the risk of flooding should reduce in Swanton Morley. There was concern from residents that new

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Reflect the text in the policy or amend the text.	development would cause surface water flooding in other parts of the village. Policy 14 of the Swanton Morley Neighbourhood Plan will not permit development proposals that increase the risk of surface water flooding, it also accepts that mitigation measures are capable of preventing an increase in flood risk.
			This only addresses the issue of surface water flooding rather than the risk of flooding from all sources e.g. Ground water, fluvial, foul surcharges etc? Justification is require3d regarding why surface water flooding is the only issue addressed in this policy. The policy also has potential implications for viability.	Surface water flooding was the only flooding issue that concerned the local community, although it is considered there is merit in increasing the scope of Policy 14 of the Swanton Morley Neighbourhood Plan to include other flood issues.
				The words supplied by Norfolk County Council, as Lead Flood Agency, will be inserted. See earlier response to Norfolk County Council (Ref 43) for full details.
				Comments noted. The Swanton Morley Neighbourhood Plan is focused on the positive that development can bring. The community realises that there is the need for growth and seeks, through the Swanton Morley Neighbourhood Plan, to positively influence the delivery of that growth.
			Amend wording to ensure that "Development that would increase the risk of surface water and/or all forms of flooding,	Comments noted. The policy wording will be amended to include all forms of flooding.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			after mitigation will not be permitted".	
			The policy includes the requirement for flood risk assessments on sites of 9 or more dwellings. The NPPF at paragraph 103 and footnote 20 sets out the requirement for site specific flood risk assessments. No evidence is provided as to why the limits within the policy have been chosen, or why there is a need to exceed the requirements within the NPPF.	Although Policy 14 of the Swanton Morley Neighbourhood Plan originally related to flooding only caused by surface water runoff, although this will now be expanded based of the Lead Flood Agency's comments. Undertaking an appropriate assessment that gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage.
			The basic conditions require neighbourhood plans to have appropriate regard to national policy.	Using Norfolk County Council's, as Lead Flood Agency, words the trigger point seems appropriate in respect of significance, likely impact and with being propitiate to the scale of development.
				Comments noted although amend as the words from Lead Flood Agency 'an appropriate assessment that gives adequate and appropriate consideration' aligns to the requirement of the National Policy Planning Framework.
			residential developments, including	Comments noted. Policy 14 refers to development proposal; this includes all non-residential and residential.
			This policy should apply to non-residential developments over a certain threshold e.g.	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			500sqms, rather than all such developments.	
		Page 75 6.207-8	In practice this is likely to be very restrictive and problematic.	Comments noted. Policy 15 of the Swanton Morley Neighbourhood Plan is designed to allow a good range of house types and
			Developers need some flexibility in design and layout. Whilst a drive for more small units is welcomed, the way this is done is too prescriptive.	layouts although it does seek to see a mix of the property sizes rather than predominately larger and less affordable properties. The ranges enable any Developer the flexibility to decide of the precise mix to meet possible
			Amend to give a broader brush limit on the different sizes.	site or viability issues.
		Page 76, para 6.212	The reference to the national and local planning documents supporting Policy 15 is very vague. It would be more useful if there was reference to relevant paragraph's or policies.	Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 76, Policy 15 Housing mix	See above comments re para 6.207-8.	Comments noted, see text above.
			Needs to have a broader sweep to allow flexibility on sites. E.g. 1-bed at least 10% 2-bed at least 25% 4-bed and larger not more than 30% The policy and reasoned justification does	The ranges proposed in Policy 15 of the Swanton Morley Neighbourhood Plan have the same starting point as is being suggested by Breckland District Council. The percentage suggested for 4-bed and larger does not reflect the trend for smaller households.
			not appear to consider the viability implications of the development. The	Household size has decreased in Swanton Morley, as per the 2001 and 2011 Census,

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			requirements in relation to the housing mix may have implications on the viability of sites coming forward within Swanton Morley which could prevent sustainable development.	highlighting the local need for more one and two bedroom properties.
			presumption in favour of sustainable	Comments noted. Achieving sustainable development, as defined in paragraph 7 and 8 National Planning Policy Framework identifies the three key dimensions as economic, social and environmental. Pointing out that these roles are mutually dependent with the planning system guide development to sustainable solutions.
				One aspect of paragraph 9 is "widening the choice of high quality homes"; currently choice is very limited and affordability is a large issue. Swanton Morley wants to continue to thrive as a community, as demonstrated by the 'Vision for Swanton Morley' and the Objectives that will deliver this.
				Paragraph 10 of the National Planning Policy Framework highlights the need to take local circumstances into account.
			Review policy with regards to viability.	Comments noted. See comments in response to paragraphs 6.207 and 6.208 above regarding viability and flexibility.
				Comments noted. Policy 15 of the Swanton Morley Neighbourhood Plan does allow for

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			where a specific need is being met.	the potential of 100% affordable housing schemes. It is unclear what reason Breckland District Council has to feels otherwise.
			May not be appropriate on all types of scheme.	Comments noted although it is felt the percentage ranges gives sufficient scope and flexibility for all types of scheme on developments of ten or more.
			Paragraph to take account of a scheme being delivered by a housing association, or scheme to deliver a particular need.	<b>e</b>
		Page 77, Para 6.221.	It should be made clear which NPPF paragraph is being referred to.	Comments noted. Will add reference to paragraph 28.
			To aid clarity. Refer to relevant NPPF paragraph.	
		Page 78, para 6.226		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 79, para 6.229.	It should be made clear which NPPF paragraph is being referred to.	Comments noted. Will add reference to paragraph 28.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			To aid clarity. Refer to relevant NPPF paragraph.	
		Page 80, para 6.234		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies, subject to comments on Policy 17 below.	
		Policy 17 Employment and Local Shops	This policy is currently worded as a statement and supports the provision of small scale employment opportunities and conflicts with policy E01 and E02 of the emerging Local Plan.	Comments noted although it should be noted that Breckland District Council seem to have fundamentally missed the point of Policy 17 of the Swanton Morley Neighbourhood Plan if Breckland District Council really believe it is in conflict with the emerging policies (not adopted policy).
			development to general employment areas	By the very nature of Policy 17 of the Swanton Morley Neighbourhood Plan it is seeking to meet exactly the requirements recognised in the Breckland Local Plan Part 1 – Preferred Directions December 2015 that states supporting text to emerging policies E01 and E02:
			Neighbourhood plans must be in general conformity with the strategic policies of the development plan (See Basic Conditions). In its present form the policy does not align with	In paragraph 8.9 it is stated "Proposals will be expected to complement their surroundings and not result in any unacceptable impacts on amenity or a severe impact on the local

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			the preferred direction of E02 in the emerging Local Plan or policy DC7 within the adopted Core Strategy and Development Control Policies DPD.	highways network. Proposals will also be encouraged to contribute towards the identified need to make provision for small and start-up businesses."
				Paragraph 8.12 outlines the following requirement " there will be a need to provide for those businesses which support the rural economy and improve opportunities for rural communities to live and work in close proximity."
				In paragraph 8.13 it is stated "where there are clear sustainability advantages for businesses being located close to the market they serve, will be supported subject to the policies relating to environmental impact, accessibility and amenity. The demonstration of sustainability advantages should include evidence of reduced need to travel, re-use of previously developed land or existing buildings and enhanced opportunities for rural communities to access employment in their locality."
				The supporting text to policy DC7 within the adopted Core Strategy and Development Control Policies document is similar in content and context, especially paragraph 4.35.
			Remove policy or amend so is phrased as a policy and is not in conflict with the	Comments noted. As demonstrated above Policy 17 of the Swanton Morley

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			development plan (e.g. supporting the approach of these policies). Also clarifying what is meant by small scale in the text and policy.	Core Strategy and Development Control
			developments that this would apply to. i.e. retail space of 250 m2 or 500 m2 that are in	The term 'small scale' does not appear in the policy text. "Small" is used in the Policy text in relation to commercial and office units, which have to be appropriate in scale to Swanton Morley.
				The term 'small scale' does appear in the Community Feedback (6.233.) where each individual would have used their own judgement in their comments.
		Page 83, para 6.248		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 85, Para 6.257		Comments noted. The details of specific paragraphs are contained within the Basic Conditions Statement.
			List relevant paragraphs or policies.	
		Page 85, Policy	The policy requires traffic impact assessments	Comments noted although it is unclear of the

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		19 Traffic Impact	for all new residential or commercial development. This exceeds the requirements set out within Breckland's Local List. No	policy status of the Breckland District Council's Local List.
			reason/evidence is given for why it is necessary to require transport assessments at lower levels than within Brecklands Local List.	On further consideration Policy 19 of the Swanton Morley Neighbourhood Plan may be too arduous for all residential development. Norfolk County Council have noted and
			This also has potential implications for viability.	suggested whereas the numbers of additional vehicles are likely to be low, they could
			The basic conditions require neighbourhood plans to have appropriate regard to local policy.	represent a high percentage increase to the existing traffic levels.
			Review evidence or remove policy.	Policy 19 will be amended to reflect this by only being required on residential developments of 10 and above (this is then consistent with the trigger points in other policies of the Swanton Morley Neighbourhood Plan. Although will still be required on all commercial proposals).
		Page 85, Para 6.259	It would be useful to identify where these photograph examples come from.	Comments noted. These are just examples from other Norfolk parish, it is not important where they are from as this may distract from the issue in Swanton Morley and what measure is appropriate as the solution for our situation.
		Page 86, para 7.1	See comments regarding Front cover and para 1.5.1 re time period of the plan.	Comments noted. The plan period of the Swanton Morley Neighbourhood Plan is twenty years. See response to paragraph 1.5.1.
			Amend date to "2017-2036".	

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				Plan period to remain as 2017 to 2037.
		Page 86, para 7.6	As commented on para 1.5.2 Breckland Council are looking to work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach.	Comments noted. Swanton Morley Parish Council is very keen to optimise the delivery of the Swanton Morley Neighbourhood Plan; its Vision and Objectives.
		Page 87, para 7.9.2	In light of the comments made in relation to Policy 4, this should be deleted.	Comments note. Policy 4 of the Swanton Morley Neighbourhood Plan is to remain.
			Breckland Council" are looking to agree an approach and work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach.	It is welcomed that Breckland District Council are looking to engage with Parish Councils to monitor delivery. Swanton Morley Parish Council are keen to be part of this and to understand the approach that is being
			Delete.	proposed.
		Pages 89-93, Section 8: Glossary	All those with a "#" by them will have the text becoming out of date when the emerging Local Plan is adopted, as it will replace all LDF documents.	Comments noted. Definitions throughout the glossary will be amended to match the glossary definition provided in Breckland Local Plan Preferred Directions document.
		Page 89, Section 8: Glossary, Allocated #	Currently not technically correct. Amend "Land, which has been identified <del>on</del> <del>the Local</del> <b>in the Development</b> Plan and <b>on</b> the <del>Proposals</del> <b>Policies</b> Map"	See comment above. Will be amended to match Breckland District Council definition.
		Page 90, Conservation Area	Not clear why there is a reference to SSSI & SAC in the description. These are already referred to in the glossary.	Comments noted. The reference to Mill Common and the River Wensum is to help local residents understand how these two key areas are protected as residents have

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Refer to local examples in the relevant section in the glossary.	referred to them as 'conservation areas'.
		Page 90, Core Strategy #	There is no reference to the fact that these documents collectively form part of the Local Development Framework (LDF) for the area. This document will not be relevant when the Local Plan is adopted.	See comment above. Will be amended to match Breckland District Council definition.
			See reference to DPD below for correct referencing.	
			Amend: "Policies document <del>sets out the key elements of the planning <b>make up the Local</b> <b>Development F</b>framework <b>(Development</b> <b>Plan)</b> for Breckland District Council."</del>	
		Page 90, Development Plan #	The Regional Spatial Strategy (RSS) no longer forms part of the "Development Plan". Remove reference to the RSS.	Comments noted. Delete reference to Regional Spatial Strategy.
		Page 90, Development Plan Documents #	Capitals letters are missing from the start of each word of "local development framework". These documents will not be relevant when the Local Plan is adopted.	Comments noted. Amend to add capital letters.
			Add mend to " <b>L</b> ocal <b>D</b> evelopment <b>F</b> ramework".	
		Pages 91,	It looks like the word "Policy" is missing form	See comment above. Will be amended to

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Development Management #	the end of the term, because as it stands this is not about processing applications. DEVELOPMENT CONTROL (also Development Management) – The process of administering and making decisions on different kinds of	match Breckland District Council definition.
		Page 92 Neighbourhood Planning	<ul> <li>planning applications. Locality Glossary</li> <li>The term "Neighbourhood Development Plan" is the technical term used in the legislation and regulations.</li> <li>To provide accuracy.</li> <li>"Introduced by the Localism Act 2011, also referred to as a Neighbourhood Development Plan in the legislation and regulations. "</li> </ul>	Comments noted. Add additional text to enhance explanation. The term is "Neighbourhood Plan" in the Glossary and not "Neighbourhood Planning" as misquoted by Breckland District Council.
		Page 93 Site Allocations DPD #	This document will not be relevant when the Local Plan is adopted.	Comments noted.
		Page 93 Statutory Body	Natural England is the new name for the Countryside Agency and the Regional Development Agency does also no longer exist.	Comments noted. These two names will be removed.
			Remove reference to the "Countryside Agency" and "Regional Development Agency".	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Page 93 Supplementary Planning Document (SPD) #	as "Development Plan" documents and remove reference to DPD. These documents will not be relevant when the Local Plan is adopted.	Comments noted. Replace abbreviation with Development Plan Document(s).
			Amend as suggested.	
		Appendix 1	There are duplicates of documents listed within this table including documents 3 & 12 and 7 & 25.	Comments noted. List to be amended to remove duplicate items and add Breckland Statement of Five Year Housing Land Supply (30.09.2016) (Published November 2016).
			To aid clarity. Revise appendix to remove duplicate documents.	
		Page 97, Appendix 1	See comments made in relation to Policy 7.	Comments noted. Middleton Avenue has not been removed from Policy 7 of the Swanton
		[should be referring to Appendix 2 on page 96]	Amend as outlined in Policy 7.	Morley Neighbourhood Plan.
		Page 97, Table 8	See comments made in relation to Policy 7.	See comments above, Table 8 is complete with Middleton Avenue included.
		Amend as outlined in Policy 7.		
		Page 98, Appendix 3	It is noted that sites 1; 4; 5; 6; 8; 9; 10; 11 (part); 13; 14; 15; 16 are currently not allocated as open space in on the policies map.	Comments noted.
			[See comments made in relation to Policy 8].	

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			Remove sites 10, 14, 15 & 16.	These sites are to remain on the list.
			N.B Please note that we will not provide proofing comments on future editions of the plan, e.g. Reg.14 and/ or Reg.16, and it is recommended that this is carried out before these versions of the plans are published. The Council will make use of the 1990 TCPA, Sch 4B, 12 (6)(e) to make any errors in the final edition of the plan.	Breckland District Council propose should align with the Examiner's required modifications and with the agreement of Swanton Morley Parish Council and not because Breckland District Council do not like
			Abbreviations: Neighbourhood Plans (NP); Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Local Development Framework (LDF).	
		Sustainability Appraisal Report	<ul> <li>It is positive to see that a sustainability appraisal has been provided alongside the neighbourhood plan pin light of the allocations proposed through the</li> </ul>	Comments noted. Breckland District Council was first asked to provide a screening opinion on February 2016 although have never provided one.
			plan, and significant work has clearly gone into it. However, it is noted that this report has been produced without a "screening" process being finalised.	As a result, a Sustainability Appraisal Report has been undertaken to support and test the Swanton Morley Neighbourhood Plan and to satisfy the requirements of the Strategic Environmental Assessment.
				The Strategic Environmental Assessment determination concluded, "the Swanton Morley Neighbourhood Plan is unlikely to have any significant environmental effect and will not require a Strategic Environmental

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				Assessment". The reasons for the determination have been given and issued to the Statutory Bodies. Whilst no response is require, Natural England did respond and "has no issues to raise regarding the SEA."
		Whole Document	Document Structure – general well structured, but still needs to be developed, as previously advised.	Comments noted. Feedback received from Breckland District Council has been incorporated in the Sustainability Appraisal
			To enable effective tracking of comments as the SMNP progresses during consultation, examination and future use of the document e.g.an appeal.	Report and further comments will be used to inform the final version of the Sustainability Appraisal Report.
			Add individual paragraph numbers throughout.	Comments noted. Paragraph numbers will be inserted.
			Text is justified on the right – this is poor practise as this can cause problems for people who have visual problems.	Comments noted. The Swanton Morley Neighbourhood Plan Steering Group wanted the document presented in this way.
			Sensory Trust information sheet: Accessible information - clear and large print (attached)	No other negative comments relating to justification have been received.
			Remove justification on the right hand side of the document.	
			The document should be available in other formats e.g. large print etc.	Comments noted. Document is available in electronic format that enables the reader to tailor the format and scale to suit their needs.

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			Equalities Act 2010 \$149 Equality Duty	
			Not clear why a consistent approach has not been addressed, as it has been in the Neighbourhood Plan.	
			The key is missing from a number of the maps e.g. what the lines represent etc.	Comments noted. Map 1 is titled "Designated Swanton Morley Neighbourhood Area", therefore key is not necessary, although the
			Add the key where this is missing.	map will be replaced with one with a key.
		Omission	There is no reference regarding the situation concerning the screening process.	Comments noted. As per previous comments Breckland District Council where asked to provide a screening opinion in February 2016,
			Needs to be clarified in the text.	although no response was received from Breckland District Council, and the approach outlined at that time was to progress with a Sustainability Appraisal.
		Page 5, Para 2.2, 4th para	Not clear whys the plan cover 21 years rather than 20 years? (Also see comments re para 5.4.3)	Comments noted. See previous responses regarding the plan period being correct as 20 years from 2017 to 2037.
			Amend date to "2017-2036".	No. Plan period is correct as 2017 to 2037.
		Page 7 Para 2.4, 1st para	It is noted that a Sustainability Appraisal Scoping Final Report (October 2016) has been produced to inform this report, but a copy has not been provided to Breckland Council, so we are not able to assess	Comments noted and Sustainability Appraisal Scoping Final Report (October 2016) is available to Breckland District Council at any time.
			whether or how our comments on the original Scoping Report have been	The Report will also be submitted as one of the supporting documents to accompany the

Swanton Morley Neighbourhood Plan – Consultation Statement

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			considered.	Swanton Morley Neighbourhood Plan Examination Version.
		Pages 8 - 9 Objectives	The SA has used Breckland's 17 sustainability objectives taken from the LDF. The new Local Plan uses 19 objectives.	Comments noted.
			Whilst the neighbourhood plan does not have to use the same sustainability objectives as the Local Plan, it would be useful if there was further information provided as to why these objectives were being used. Review/Explain objectives.	Comments noted. The Sustainability Appraisal Report (December 2016) makes use of the agreed sustainability objectives identified and consulted on with the Statutory Bodies in the Sustainability Appraisal Scoping Report (July 2016) to assess the policies in the Swanton Morley Neighbourhood Plan.
				In Breckland District Council's response to the Sustainability Appraisal Scoping Report (July 2016) Breckland District Council made no mention of the new 19 objectives for the emerging Local Plan or any request to amend the proposed Sustainability Appraisal Framework.
		Page 12, Para 4.3, 1st para	Reference is made to alternative options. No alternative options appear to have been assessed through the sustainability appraisal	Comments noted. As per the text in paragraph 4.3 the alternative suggestions are all documented in full in Appendix 5 of the Swanton Morley Neighbourhood Plan and in the Emerging Policy Statements Discussion Document, which is contained in an
			The regulations require the assessment of reasonable alternative options.	appendix in the Consultation Statement. As part of the Sustainability Appraisal

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			Assess alternative options for policies	alternatives considered included in each of the Policy assessments.
		Page 13, Table 4	5. East of England – should this document be reviewed as it was "revoked" in January 2013?	Comments noted.
			In light of this, clarify why document is being referred to.	The explanation is as per text at the end of Table 4.
		Page 14, Para 4.5.1, 4th para	The statement "The documents released with both of these consultations Caused issues and misunderstanding with local residents" has not been justified with any evidence. Statement needs to be justified.	Comments noted. Local residents were very confused and upset at the level of development they believed was planned for Swanton Morley. It was not appreciated by, or explained adequately to, residents that the sites were only options rather than everyone being built on.
		Page 15, Para 4.5.3, 2 <sup>nd</sup> para	Not clear why this states that it is a 20 year plan, when the time period 2017-2037 is twenty one years.	Comments noted, although incorrect as the plan period is 20 years from 2017 to 2037.
			Amend date to "2017-2036".	No need to amend date as it is correct.
		Page 17, Para 5.2, 2 <sup>nd</sup> para, Table 5. Summary of Policy Appraisals	It seems surprising that not a single negative score has been received against any of the objectives in the assessment of the impacts. Having reviewed some of the appraisals it is unclear how the scoring has been achieved for some of the policies, i.e. Policy 2 objective 1 scores positively, however it will result in the loss of grade 3	Comments noted. The context and assessment is of each of the policies in the Swanton Morley Neighbourhood Plan and their impact against the decision making criteria and points of consideration in the Framework built through the Sustainability Appraisal Scoping Report.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			greenfield agricultural land. Breckland have assessed these sites against the Local Plan criteria for the same objective and it scored negatively. It is important to note that a negative score against an SA objective doesn't have to be a showstopper, and it is important to take a balanced approach, looking at how well the policy scores against all objectives.	Whilst there is loss of farmland associated with the sites identified within Policy 2 Swanton Morley Neighbourhood Plan, it should be noted that there are no brownfield sites in Swanton Morley and these sites continue to protect the 'best' agricultural land from development.
			For instance a negative score against one objective may be outweighed by the positive scores of other SA objectives. It is important to reflect the overall balance to consider whether a policy represents sustainable development.	Comments noted. On balance it was assessed that the expansion of development in these areas provided protection for more productive agricultural land.
			The SA and SEA regulations require the assessment of likely effects of the plan. Review scoring mechanism	Comments noted. The likely assessment is that the loss of lower grade farmland is more acceptable than the possible loss of grade 1 or grade 2 farmland.
		Page 18, Para 5.3, 1st para	As Breckland Council are looking to work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach. It is would be constructive if an agreed consistent approach towards monitoring was taken.	Comments noted. It is very welcomed that Breckland District Council finally looking to engage with Parish Councils to monitor delivery. Swanton Morley Parish Council is keen to be part of this and to understand the approach that is being proposed.
			A matter for the two Councils to discuss	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Page 19, Para <mark>(Section)</mark> 6 4th para	Breckland Council requests that if any updated copies of the Sustainability Appraisal Report are produced, we are supplied with a copy.	Comments noted.
			For openness and transparency. Swanton Morley to provide, if produced.	
		MEETING 10 April 2017	Meeting held on Monday 10 April 2017 to review Breckland District Council's consultation response. Attendees were Breckland District Council's Neighbourhood Planning Officer (Susan Heinrich), Chairman of the Parish Council and Swanton Morley Neighbourhood Plan Steering Group supported by the Clerk and Abzag. The Deputy Clerk took notes.	The meeting was arranged and welcomed to give opportunity for clarity to be sought on a number of Breckland District Council's responses and more information to be provided by Breckland District Council to explain their responses. The Steering Group was disappointed at the negative position that Breckland District Council had taken in their initial consultation response.
				The meeting notes are included as an appendix of the Consultation Statement.
		Email 13 April 2017	Email covering Breckland District Council's responses date 13 April 2017.	The Steering Group appreciate Breckland District Council reviewing the responses and responding with any remaining areas of concern or points for clarity.
			Further to our meeting, I have the following responses regarding the matters raised.	

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Page 40, Policy 4 Local Lettings	There is concern that the evidence used to justify this policy, is not consistent with what its purpose was for e.g. for rural exception sites, not general affordable housing.	Comments noted. The 'evidence' is the evidence. The Housing Needs Survey, undertaken by Breckland District Council, identified the housing need for Swanton Morley. Therefore, this is the evidence that there is a need.
				Breckland District Council are comfortable that the evidence is correct and, therefore, it is right that it should be used in the context of housing need for Swanton Morley in relation to the justification and background to Policy 4 of the Swanton Morley Neighbourhood Plan.
			The legal requirements are qualified in comments made in relation to para 6.60- 6.72 (p41-42).	Comments noted. Breckland District Council's legal requirements are recognised and supported. Policy 4 of the Swanton Morley Neighbourhood Plan does not effect these requirements as the Policy stipulates that people need to be on Breckland District Council's Housing Register. Therefore, meeting Breckland District Council's legal requirements.
				Whilst Breckland District Council do not like Policy 4 of the Swanton Morley Neighbourhood Plan; the Policy is included to improve opportunities for those with connections with Swanton Morley and it is hoped that Breckland District Council will support the ambition of the local community with Policy 4.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				No reason has been raised why Breckland District Council would not be able to implement Policy 4. Broadland District Council already have a successful district wide Local Letting Policy.
		Page 48, Policy 6 Delivery of Planning Obligations	Breckland Council would be happy to design a policy where the Parish would be responsible for the delivery of particular local infrastructure – are the Parish prepared to do this?	Comments welcomed. The inclusion of Policy 6 in the Swanton Morley Neighbourhood Plan demonstrates the commitment and drive of the local community of Swanton Morley, therefore, the answer is "yes".
				Whilst reflecting on the discussions at the meeting on 10 April 2017 the Steering Group recognised that Policy 6 may be seen to go further than its intended outcome. Therefore, the Policy will be reworded to reflect the intent to add local knowledge in key areas and limit the signatory requirement of the Swanton Morley Parish Council to the delivery of open and recreational space and any additional community requested benefits.
		Policy 7 Local Green Spaces	Currently this site is designated as open space in the adopted Local Development Framework (LDF); this remains the case for the emerging Local Plan (LP). Whilst the Council's assets team have made representations to re-designate this site from a commercial perspective, this representation (and any subsequent ones	Comments noted. There is concern that Breckland District Council is seeking to re-designate these much-loved local open spaces within the emerging Local Plan to enable development on them.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
			received during the final Local Plan consultation (Reg.19) will be considered by the Inspector when the Local Plan is examined. The site is designated in the adopted Development Plan, which is what the NP examiner will be undertaking his basic conditions check against.	The local community supports these three areas remaining as open space for the enjoyment of all residents.
			On that basis, the current justification for allocating the Local Green Spaces in Appendix A is a statement without appropriate evidence. Stating the sites meet the requirements of NFFP para 77, is not sufficient in itself– evidence is required to justify this approach, but the sites are already protected through the adopted LDF/LP.	Comments noted. All three areas meet the requirements for Local Green Space, this Breckland District Council has recognized in its earlier response by accepting that two or the three areas as Local Green Space.
		Other matters	The "Local list" being referred to under Policy 19 – Traffic Impact is found on the following webpage: <u>http://www.breckland.gov.uk/article/2938/</u> <u>Validation-Local-List-OS-Map-Service</u> see p20 on Transport Assessments	Comments noted. Thank you for clarifying the location of the Local List. See earlier comments in relation to the approach supported by Norfolk County Council to Traffic Assessments for Swanton Morley.
			To be consistent with the other development plans in the area, and to assist monitoring, the key issue is for the time period is for the plan to end in 2036.	Comments noted. There is no justification or need for the Swanton Morley Neighbourhood Plan to have the same end date. The end date will remain as 2037.
		Page 45, Policy 5	Breckland Council would be happy to work with the Parish to design a policy that can	Comments welcomed. It is seen as a positive step forward that Breckland District Council is

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
		Affordable Housing on Exception Sites	be implemented – are the Parish prepared to do this?	able to work with the local community of Swanton Morley and now recognises that Policy 5 in the Swanton Morley Neighbourhood Plan now enables Breckland District Council to be able to implement Policy DC5 of the Core Strategy and Development Control Policies – through a mechanism to demonstrate 'local support'. The answer is "yes".
		Additional question	Also there is still the outstanding regulatory matter raised in my email of the 13 <sup>th</sup> and 20 <sup>th</sup> January 2017 concerning availability of hard copies of the Neighbourhood Plan to view.	Comments noted. As previously explained hard copies of the Swanton Morley Neighbourhood Plan were available to be viewed at the Swanton Morley Village Hall, including an enlarged A3 copy.
				The regulatory requirements of publicising the Swanton Morley Neighbourhood Plan is the Local Planning Authority's (Breckland District Council) responsibility. To assist Breckland District Council in meeting the requirements of Regulation 16 the Swanton Morley Parish Council is happy to provide a hard copy of all documents.
				It is pleasing that the additional information and meeting has alleviated the initial concerns raised by Breckland District Council about certain elements of the Swanton Morley Neighbourhood Plan and helped the understanding of the need and the weight of local support for the policies within the

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				Swanton Morley Neighbourhood Plan.
				Proposed action:- the following changes will be made to the Swanton Morley Neighbourhood Plan.
				All references throughout the document will be amended to only refer to Breckland District Council as Breckland District Council.
				Where required add 'key' to maps.
				Foreword, paragraph 4, 2 <sup>nd</sup> sentence: Amend to the same text used in paragraph 3.6.1.
				Foreword, paragraph 5, 2 <sup>nd</sup> sentence: Amend to Breckland District Council's planning policies.
				Executive Summary, paragraph 4, 2nd sentence: The text will be amended to match that used in paragraph 3.6.1.
				Insert a new wider area Map 2.
				2.3.3 to 2.3.10: Text to photographs to say "and recent view".
				3.7.1: Add text 'has followed the plan making process'.
				3.8.2: Amend wording to "Applications for

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				planning permission must be determined in accordance with the Development Plan.
				5.2.1: Amend 'Local Plan' to 'Local Development Framework' and add 'December' to the text referring to the date of adoption of the Core Strategy.
				6.8: Add text 'and has been passed to the Parish Council for consideration and, if required, action'.
				Policy 1: Amend text to 'settlement boundary'.
				6.33: Updated to reflect the five-year housing land supply published in November 2016.
				6.40: Amend bullet point 4 to 'Central'.
				6.60: Insert data source as 'Housing Needs Survey Report for Swanton Morley produced by Breckland District Council in October 2015'.
				6.68: Add more text to explain how calculation of the number to match local need.
				Policy 4: 'The requirement to Breckland District Council's housing register' and 'employed' will be added to the policy.

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				Add text to explain the requirement to be on Breckland District Council's housing register.
				Policy 6: Reworded and to limit the signatory requirement of the Swanton Morley Parish Council to the delivery of open and recreational space and any additional community requested benefits.
				6.104: Amended the first sentence to "The Sensitivity Assessment, Breckland District Settlement Fringe Landscape Assessment (July 2007), is"
				6.116: Amend to Appendix 2.
				6.140: Amend text to "existing development" and delete "historic". Map 9: To be replaced with a new map with viewpoints.
				6.158: Add to text "Section 11 paragraph 109".
				Policy 14: Amend to use policy wording provided by Norfolk County Council.
				6.221: Amend text to add reference to paragraph 28.
				6.229: Update text to include reference to paragraph 28.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
				Policy 19: Amend policy text to 'only being required on residential developments of 10 and above.
				Glossary: To be updated with the definitions to match the glossary definition provided in Breckland Local Plan Preferred Directions document.
				Delete reference to Regional Spatial Strategy.
				Add capital letters to Local Development Framework.
				Add text "Neighbourhood Development Plan in the legislation and regulations. "
				Remove reference to "Countryside Agency" and the "Regional Development Agency".
				Replace abbreviation DPD with Development Plan Document(s).
				Appendix 1: Remove duplicate listings and add Breckland Statement of Five Year Housing Land Supply (30.09.2016)(Published November 2016)
				Sustainability Appraisal Report: Paragraph numbers will be inserted.
				Map 1: Will be replaced with one with a key.
49	Swanton Morley Resident	-	ee with all 19 policies and Sustainability praisal.	Thank you for your support and your comments.

Ref No.	Name	Policy Theme Section	Response	Neighbourhood Plan Comment & Action
	Completed at Consultation Event – no name or address given.	Policy 1	A designated Greenbelt between SM and Dereham.	Comments noted. See as a solution to stopping Dereham swallowing up Swanton Morley but not practical to deliver.
		Policy 4	Returning SM veterans to be added to the housing priority list.	Comment noted. Veterans already have high priority on the Housing Register.
		Policy 15	More Bungalows.	Comment noted. It is important that the housing stock addresses the need and requirement of Swanton Morley by delivering the right type and size of new homes.
		Policy 16	Mobile phone transmitters on the BT mast in Roberson Barracks.	Comment noted.
		Policy 17	If new shops are planned, then SM stores and the butcher shop should be given first option for tenancy.	Comment noted. Proposed action:- No changes proposed to the Neighbourhood Plan.

Swanton Morley Neighbourhood Plan

## Swanton Morley Parish Council Swanton Morley Village Hall Manns Lane Swanton Morley NR20 4NP

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