

# Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (JNP) Consultation Statement



January 2018

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## **1. Introduction**

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012.
- 1.2 Section 15(2) of Part 5 of the Regulations sets out what a consultation statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed Joint Neighbourhood Plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns that were raised by the persons consulted;
  - d) Describes how these issues and concerns have been considered and where relevant, addressed in the proposed Joint Neighbourhood Plan.
- 1.3 This consultation statement will also demonstrate that the process undertaken to produce the Croxton, Brettenham & Kilverstone Joint Neighbourhood Plan has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a Neighbourhood Plan to the Local Planning Authority (in this case Breckland District Council) a qualifying body (this case the Parish Councils) must:
  - i. Publicise, in a manner that it is likely to bring it to the attention of people who live or work within Croxton, Brettenham and Kilverstone civil parishes,
  - ii. Provide details of the proposals within the Joint Neighbourhood Plan;
  - iii. Provide details of where, how and when the proposals within the Plan can be inspected;
  - iv. Set out how representations may be made; and
  - v. Set out the date for when those representations must be received, being not less than 6 weeks from the date from when the draft proposals are first publicised;
  - vi. Consult any consultation body referred to in Para 1 of Schedule 1 whose interests the qualifying body may be affected by the proposals for a Joint Neighbourhood Plan;



Vii Send a copy of the Joint Neighbourhood Plan to the Local Planning Authority.

- 1.4 Furthermore the Planning Practice Guidance (PPG) at paragraph 15, requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan and to ensure that the wider community:
1. is kept fully informed of what is being proposed,
  2. can make their views known throughout the process,
  3. has opportunities to be actively involved in shaping the emerging Neighbourhood Plan
  4. Is made aware of how their views have informed the draft Neighbourhood Plan or Order

## **2. Context for this Joint Neighbourhood Plan**

- 2.1 The Breckland Core Strategy adopted in 2009, made a strategic allocation of 6,500 new dwellings on greenfield land to the north of the town of Thetford. The identified area is immediately adjacent to the built-up area of Thetford but within the parishes of Croxton, Brettenham and Kilverstone. In addition, the Core Strategy indicated that 5,000 net new jobs would need to be provided over the same time period i.e. up to 2026. The allocation is to the north and east of the town and has become known as the Thetford Sustainable Urban Extension or SUE.
- 2.2 The Thetford Area Action Plan (TAAP) adopted in 2012, provided further detail on the development to take place in the SUE including, the form of development to take place, overall density, phasing details, identification of the supporting infrastructure that would be required and setting out the design principles to be adhered to. The TAAP also included the revised figure of 5,000 new dwellings for the SUE.
- 2.3 Unsurprisingly, given the large numbers of new dwellings being talked about and the fact that the new dwellings proposed were outside of the parish of Thetford but within the rural parishes of Croxton, Brettenham and Kilverstone, there was considerable concern from the residents of the rural parishes about the impacts of this large-scale development on the rural areas. How the new development would physically integrate with the existing development was a key concern but also an equal concern was how the new communities created by the new development would integrate with the existing communities – not only the urban community of Thetford but the rural communities.
- 2.4 The Parish Councils decided to respond to these concerns by taking positive and proactive action to manage these impacts. They decided to use the new powers and processes available to them under the 2011 Localism Act and prepare a

Neighbourhood Plan which could not only influence the development of the SUE but also act as a mechanism to try to ensure the physical and social integration of the SUE with the existing rural communities.

### **3. Designation of the Joint Neighbourhood Plan Area**

- 3.1 In the beginning, Croxton Parish Council sought to produce a Neighbourhood Plan solely for Croxton and applied to Breckland Council for the parish to be designated a Neighbourhood Plan area on 8<sup>th</sup> January 2014. The [Neighbourhood Plan Area Statement](#) and [Map](#) are available on the Breckland Council website.
- 3.2 Breckland Council's Cabinet refused this request on 1<sup>st</sup> July 2014 and the reasons for that refusal are set out in a refusal letter [here](#)
- 3.3 On the 23<sup>rd</sup> April 2014, Croxton, Brettenham and Kilverstone Parish Councils applied to designate a Neighbourhood Plan area which covers the area enclosed within the Croxton, Brettenham and Kilverstone Parish Boundaries.
- 3.4 The Neighbourhood Plan area statement and Map can be found in full at **Appendix A**. However, in essence:  
  
*"The purpose of the Neighbourhood Plan is to maintain the sense of place and quality of life in the Parish by preserving the balance between future development landscape together with green open space and agricultural balance."*
- 3.5 The Neighbourhood Plan area was designated by Breckland Council on 8<sup>th</sup> July 2014 following a six-week public consultation period that closed on 31<sup>st</sup> May 2014 and carried out in accordance Regulation 7(1). Breckland Council confirmed the Parish Councils were "relevant bodies" within the meaning of the Act for the respective parts of the plan area within each Parish area.
- 3.6 The Neighbourhood Plan Decision Notice can be found in full at **Appendix B**.

## **4. Community Engagement Stages**

- 4.1 The Parish Councils have led on the preparation of the draft plan and it is hoped that the document reflects the community's vision and aspirations for the future of the parishes involved. In order, to create a Plan that represents the needs and aspirations of residents, the Parish Councils have drawn upon a number of sources including evidence gathered through the various stages and as a result of stakeholder and community input.
- 4.2 The management of the Neighbourhood Plan process has been undertaken by the Parish Councils themselves with support from other local residents as required. Joint working across the three Parishes was recognised to be a fundamental requirement for a successful Neighbourhood Plan and a Joint Steering Group consisting of local councillors from each of the Parishes (and supported by other local residents at key stages e.g. Character Appraisal Survey Work was established to progress the Plan. All formal decisions in respect of the Plan have been taken in public at respective Parish Council meetings that are open to the public and minutes have been made publicly available.

### **Parish Questionnaire**

- 4.3 The Parish Councils began background work and research soon after the formal designation of the Neighbourhood Area. An Open Meeting was held on Saturday 13<sup>th</sup> September 2014 and comments made at that meeting together with subsequent comments made at Parish Council meetings helped to influence the questionnaire content.
- 4.4 In March 2015, the Parishes jointly produced a questionnaire (**Appendix C**) that was hand delivered to every household with the Neighbourhood Plan area.

The number of households breaks down as follows:

Croxton – 187

Brettenham – 150

Kilverstone - 29

Residents were asked to respond by the 17<sup>th</sup> April 2015.

- 4.5 Posters and flyers drawing attention to the questionnaire were available at each of the Parish Council Notice Boards.

- 4.6 The Parish Questionnaire had 27 specific questions that covered a range of topics such as housing, traffic, local facilities, health, open space, environment and business. In addition, there was also space for free text for a number of questions so that residents could comment in more detail or add their own ideas.
- 4.7 At the end of the consultation period 77 questionnaires were returned.
- 4.8 During the autumn of 2015, the results of the questionnaire were analysed. The results can be seen in **Appendix D** and are on the Joint Neighbourhood Plan website at:
- [www.c-bandkjointplan.norfolkparishes.gov.uk](http://www.c-bandkjointplan.norfolkparishes.gov.uk)
- 4.9 The individual parish websites also contain information on the progress of the Neighbourhood Plan.
- <http://croxtonpc.norfolkparishes.gov.uk/>
- <http://brettenham-and-kilverstonepc.norfolkparishes.gov.uk/>
- 4.10 The results of the questionnaire were then used by the Parish Councils to scope the potential content of the Neighbourhood Plan.

### **Scoping of the Neighbourhood Plan**

- 4.11 The Parish Councils wanted to produce an outline of the proposed Neighbourhood Plan, which could then in turn be submitted to Breckland Council to enable a determination to be made as to whether Strategic Environmental Assessment (SEA) would be required. This assessment is known as Screening. The Parish Councils were conscious that the Plan area contains a number of national and international wildlife designations and need to know therefore at an early stage whether Strategic Environmental Assessment would be required to ensure that it would be produced alongside the Plan.
- 4.12 A public Scoping Workshop was held at Croxton Village Hall on 11<sup>th</sup> February 2016, which was attended by Parish Councillors from both Parish Councils as well as members of the public and the county councillor. The Scoping Workshop was facilitated by an independent consultant.
- 4.13 Participants were encouraged to discuss the key issues raised through the questionnaire process and begin to think about whether those issues could be resolved through a Neighbourhood Plan or whether another process would be more appropriate.

- 4.14 The outcome of the session was some broad agreement around the key issues that needed to be addressed by the Joint Neighbourhood Plan (JNP). It was recognised that some issues were common to both parishes but also that there was some site specific or parish specific issues.
- 4.15 The outputs from the work shop were written up by the consultant and circulated to all participants.
- 4.16 They were then turned by the consultant into a Scoping document which the Parish Councils used to begin engagement with Breckland District Council to explore the Strategic Environmental Assessment issue in March 2016. The Scoping document was submitted to Breckland Council on 31<sup>st</sup> March 2016. **(Appendix E)**.
- 4.17 At the end of April 2016, the independent consultant produced a Progress Report on the Work undertaken to date which was considered at the Parish Council meetings in May 2016 as follows:
- Brettenham and Kilverstone – 11<sup>th</sup> May 2016
- Croxtan – 12<sup>th</sup> May 2016.
- 4.18 The Progress Report was also placed on the Joint Neighbourhood Plan website and the websites of the individual Parish Councils.

#### **Strategic Environmental Assessment**

- 4.19 Despite submitting a request for a Screening Opinion to Breckland Council for SEA in March 2016 which was undertaken using the Scoping Document, it wasn't until July 2016 that the Parishes received an answer. The Screening Determination from Breckland Council **(Appendix F)** indicated that Natural England had concerns over the potential impact on internationally designated wildlife sites that could arise from new development – specifically housing but also education and care facilities.
- 4.20 The Parish Councils were disappointed as there was no desire expressed from the communities at this stage for further new development above and beyond that already planned for the SUE.
- 4.21 Advice from Breckland Council at a meeting on 2<sup>nd</sup> August 2016 was to re-apply for a Screening Determination but that more definition and clarity would be required and that this could be achieved through the production of a set of informal draft plan policies.

- 4.22 A second progress report was produced and agreed by the Parish Councils outlining the delays that had been experienced, the timetable for moving forward and also gave a brief outline of the draft policy areas to be covered by the draft Plan. This report is attached as **Appendix G**. The purpose of the progress report was to update residents and it was available on the usual websites.

#### **Informal Draft Plan Policies and Character Appraisal**

- 4.23 The scoping exercise had also highlighted that the rural character of the parishes – and the potential impact of the proposed new SUE development on this - had been highlighted as a key concern of local residents. In addition, the concerns of Natural England in respect of impacts on the natural environment led the parish councils to consider how this may be best captured in the JNP.
- 4.24 Advice from the Independent Consultant, suggested that there would be benefit in a Character Appraisal of each of the Parishes being undertaken based on the Historic England Guidance and on the Planning Advisory Service templates but also considering the historic fabric of the area. This could then be used to underpin relevant policies in the plan but would also be a good way of involving the wider community.
- 4.25 After an initial briefing session from the independent consultant, the Character Appraisal survey work was undertaken by teams of local residents.
- 4.26 The Croxton Appraisal was completed in August by a single survey team. Further historical information was also provided by the parish historical expert and some further contributions from long standing residents and landowners.
- 4.27 Brettenham Parish was split into 3 separate areas which reflected the distinct settlement pattern and also allowed for greater community input from a wider range of residents. The three areas were: Brettenham (Village), Brettenham West (including Arlington Way) and Rushford. Three separate teams conducted the surveys and contributed photographs. The Kilverstone survey work was undertaken by a separate single team which included one of the two significant landowners in the village. The survey work was undertaken in early September 2016.
- 4.28 By the end of September 2016, 1<sup>st</sup> drafts of the Character Appraisal document and the JNP policies had been produced and the Parish Councils approved them for public consultation purposes.

## **Informal Consultation October-November 2016**

- 4.29 An informal 6-week public consultation took place from 29<sup>th</sup> October until 30<sup>th</sup> November 2016. During the consultation an informal drop in session was held at Croxton Village Hall on Saturday 29<sup>th</sup> October 2016 10am -2pm. The event was publicised on the websites and a flyer was produced and sent to each household giving details of the event as well as the consultation dates and where to send any comments (**Appendix H**). At the consultation event exhibition material was available for the public to view – including specific panels for each draft policy. Hard copies of the Character Appraisal and the JNP policies were also available for people to take away. There was also the opportunity for comments to be made in writing on the day. The exhibition was staffed by representatives from the Parish Councils and the Appraisal survey teams available to answer any questions on the work undertaken to date. The District Councillor was also in attendance.
- 4.30 60 members of the public attended the event and comments were made on the day.
- 4.31 In addition further comments were received via email by the Parish Councils during the consultation period.
- 4.32 The JNP Steering Group met on 5<sup>th</sup> December 2016, to initially assess the responses received. Each individual comment has been logged and assessed. A table showing each individual comment made together with a suggested specific response from the Parish Councils and any proposed changes to the Plan was produced. One table was produced for the Character Appraisal and one for the JNP Policies.
- 4.33 The suggested responses were agreed by the Parish Councils at a joint meeting held in Kilverstone on 18<sup>th</sup> January 2017 and the responses were placed on the website. Respondents were also notified that of the response to their specific representations. At this stage responses are anonymised as it had not been made overtly clear that any representations submitted would be in the public domain. Future consultations will make this clear in the information publicising the consultation and in describing how to respond. The tables can be found in **Appendix I** (Character Appraisal) and **Appendix J** (JNP Policies).
- 4.34 Shortly afterwards the Parish Councils received some additional comments from Breckland Council on both the JNP policies and the Character Appraisal. The Breckland responses were submitted in tabular format and each comment has been assessed by the Steering Group at its meetings on 23<sup>rd</sup> February and 5<sup>th</sup>

March 2017. Each comment has received a specific response and the full tables can be found at **Appendix K** and **L**

- 4.35 In addition the Parish Councils received a second screening opinion from Breckland Council based on the Informal Consultation Draft which indicated that Strategic Environmental Assessment would not be required for the Plan subject to a number of minor amendments to the wording of some policies. The Screening Opinion can be found at **Appendix M**.

#### **Summary of key issues raised.**

- 4.36 The key issues raised during the informal consultation exercise can be summarised as:
- Character Appraisal for Brettenham would benefit from re-ordering and additional text
  - Maps of the Character Areas required
  - Some concerns over community participation levels
  - Suggested Factual updates. photographs and additional information for both Character Appraisal and JNP policies
  - Concern that Policy JNP11 is actively proposing development at the vicarage (Croxtan)
  - Concerns over traffic
  - Importance of village gateways to be emphasised
  - General concerns over the levels of development proposed in the SUE
  - Scepticism about the likely delivery of the proposed community facilities in the S106
  - Concerns over the designs of existing development and scepticism as to whether the JNP will be used by the Local Planning Authority in their decision making.
  - More information about the context of the Plan and relationship with the SUE required.

#### **REG 14 – Formal Consultation**

- 4.37 Following the informal consultation period, the Parish Councils began work on the next stage of plan preparation.
- 4.38 All changes highlighted in the response tables – public comments and BDC



comments have been made to the Plan together with the suggestions contained within the Screening Opinion.

- 4.39 Additional text, clarification, photographs and policy wording changes have also been incorporated. There was also a considerable amount of new mapping required and some delays were experienced in completing this aspect.
- 4.40 The Consultation Draft Plan was agreed for public consultation by the Parish Councils at a Joint Parish meeting held on 2<sup>nd</sup> August 2017 at Kilverstone.
- 4.41 The public consultation ran from 11<sup>th</sup> August to 29<sup>th</sup> September 2017 (a period of just over 6 weeks). Public Notices (**Appendix N**) were placed in the press – Thetford and Brandon Times, Eastern Daily Press, (**Appendix O**) on parish noticeboards and in the Parish Newsletters. A flyer (**Appendix P**) was also produced and delivered to all households in the JNP Area. The revised JNP policies and Character Appraisal documents were available on all three websites, Breckland Council's website and in hard copy from the Parish Councils, in identified collection points within the Parishes and in Thetford Library
- 4.42 A wide range of statutory and non-statutory stakeholder organisations, adjoining parish councils, relevant District and County Councils were notified via email of the consultation dates, how to make representations and where the documents can be located. (**Appendix Q**)

Further information can be found on the Joint Neighbourhood Plan website:  
[www.c-bandkjointplan.norfolkparishes.gov.uk](http://www.c-bandkjointplan.norfolkparishes.gov.uk)

- 4.43 Following the closing date of the REG 14 Consultation, all representations received were logged, assessed and analysed and a suggested response to each comment was produced. In total over 150 individual comments were received from 10 separate respondents. A summary table of responses to both the JNP Policies and the Character Appraisal document are shown at (**Appendix R and S**).

4.44 **Summary of key issues raised.**

The key issues raised during the informal consultation exercise can be summarised as:

- Factual updates to text and maps
- Minor changes in policy wording to be consistent with national

terminology

- Need to address flooding and surface water drainage
- Greater clarity over the relationship with the SUE
- Suggested additions to the list of non-designated heritage assets
- Need to strengthen rationale for the identified strategic gaps.
- Consolidation of references to protecting the natural environment into one policy
- More photographs to be included in the JNP document to illustrate specific policies.
- Requirement for a glossary

4.45 Following consideration of these representations the following key changes were made to the JNP policies and Character Appraisal documents:

- Changes to the SUE policy to reflect the need for gradual transition between urban and rural character
- New Natural Environment Policy
- New policy on Floodrisk and Surface Water Drainages
- New Policy on Greens and Open Spaces
- Additional wording and rationale to reinforce policy on areas outside of the villages to be protected from development to avoid the coalescence of settlements
- Identification of additional non-designated heritage assets
- Identification of specific traffic concerns within the villages.
- Addition of a glossary, complete list of non-designated heritage assets and photographic credits.
- Additional maps

#### **REG 16 – Submission**

4.46 Following consideration of the revised JNP and Character Appraisal Documents at the Joint Steering Group meeting of 11<sup>th</sup> January 2018, the Plan was submitted to Breckland Council on 19<sup>th</sup> January 2018.

4.47 The documents together with this Consultation Statement and the Basic Conditions Statement can be viewed at:

[www.c-bandjointplan.norfolkparishes.gov.uk](http://www.c-bandjointplan.norfolkparishes.gov.uk)

<http://croxtonpc.norfolkparishes.gov.uk/>

<http://brettenham-and-kilverstonepc.norfolkparishes.gov.uk/>

# **Appendices**

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## **Appendix A – Neighbourhood Plan Area Designation Statement**

### **CROXTON, BRETtenham and KILVERSTONE JOINT NEIGHBOURHOOD PLAN STATEMENT**

Croxton and Brettenham & Kilverstone Parish Councils being duly elected councils are appropriate bodies under The Neighbourhood Planning Regulations (2012) for the purpose of preparing a Neighbourhood Plan (as defined in Section 61.G of 1990 Act).

We hereby notify Breckland Council that the Parish Councils would like to submit a Neighbourhood Plan Area as first step in this process.

The designated Plan Area is as shown on the attached map and is the area enclosed within the boundaries of Croxton, Brettenham and Kilverstone Parishes.

The Plan area will cover the whole of the civil parishes of Croxton, Brettenham and Kilverstone. This is in line with the Government's new approach to planning, which aims to give local people more say about how their area is developed. This is particularly important for these Parish Councils, which are under considerable development pressure, primarily as a result of their location.

Breckland District Council's Core Strategy (2009) allocates in excess of 5,000 dwellings to the parishes together with commercial development and provision of recreational areas. The development area defined is also part of the Thetford Area Action Plan (TAAP) 2012. The Plan covers the same period as the Core Strategy, which will end in 2026.

The Neighbourhood Plan would be the only single document that covers the whole of the combined Parish Council areas and its key purpose is to reinforce local distinctiveness and sense of community identity of two very different parts of the Parishes – e.g. the new development area and the traditional original rural village settlements.

The purpose of the Neighbourhood Plan is to maintain the sense of place and quality of life in the Parish by preserving the balance between future development landscape together with green open space and agricultural balance.

A Parish Plan for Croxton was developed and issued in 2005. This was due to be revised/updated. However, both Parish Councils now believe the requirement is for a joint Neighbourhood Plan to be produced in conjunction with the Breckland Council Core Strategy and Development Plans outlining development proposals which affect both Parish Councils between now and 2026.

The Neighbourhood Plan will include the following issues:

- 1 Residential development in conjunction with local needs and including the vision outlined in paragraph three above
- 2 To review requirement and provision of community facilities

- 3 To provide and maintain sustainable Parishes and resilient villages within the Plan area
- 4 To protect landscape and nature conservation
- 5 To improve transport infrastructure where necessary within aim of item 3 and reduce the need for private car use
- 6 Development of Employment and business use within the Parish in line with stated aims above

## **Appendix B – Neighbourhood Plan Area Decision Notice**



**Localism Act 2011**

**The Neighbourhood Planning (General) Regulations 2012**

**8<sup>th</sup> July 2014**

### **Decision Document**

#### **Preliminary**

At the Cabinet Meeting on Tuesday 1st July 2014 the Council considered the application for a designation of a Neighbourhood Plan Area, supported by a map of the intended area and supporting statement, which had been submitted on by Croxton, Kilverstone and Brettenham Parish Councils

These Councils are “relevant bodies” within the meaning of the Act for the respective parts of the plan area within each Parish area.

#### **Consultation**

Following the receipt of the application and supporting documents the matter was publicised for public consultation for a period of six weeks, closing on 21<sup>st</sup> May 2014, and in accordance with Regulation 7.(1)

During the consultation, the Council received comments from Thetford Town Council who considered that the Thetford Area Action Plan should be the defining planning document for the area. Comments were also received from Pigeon Investments (the promoters of the Thetford Sustainable Urban Extension) indicating a desire to engage with the parishes on the neighbourhood plan.

No other representations were received during the consultation period.

#### **Suitability of Area for Neighbourhood Plan Purposes**

The Council considers that the area proposed is suitable for Neighbourhood Planning purposes and accepts that the suggested amendment to the draft boundary raise no planning concerns in this respect.





## Appendix C – Joint Neighbourhood Plan Questionnaire

# CROXTON and BRETtenham & KILVERSTONE PARISH COUNCILS Joint Development Plan - Questionnaire

The Government passed the Localism Act in November 2011. This Act stipulates that an approved Neighbourhood Plan will be protected by law and form part of the future process when considering any future development proposals. We are developing a Joint Neighbourhood Plan to ensure that any future development and changes which take place meet the needs and aspirations of the people living in these parishes.

The Joint Neighbourhood Plan (JNP) will cover such areas as:

**Development :** The type and density of development (housing, business and associated infrastructure) which we would like to see come into the Parishes and appropriate location(s).

**Traffic and Transport :** Managing traffic in the Parishes, developing a sustainable transport facility which is environmentally friendly, safe, and meets people's needs.

**Environment, Facilities and Amenities :** These will include Health facilities, Community facilities and Amenities including play areas, sport facilities, access to the countryside, wildlife areas and protection 'ensuring that the heritage of the parish is maintained and supported including established hedgerows, listed buildings and open spaces, and protecting the integrity of the parishes for the future'.

The Joint Neighbourhood Plan we are developing needs to consider ways to integrate the proposed new development (SUE) in Croxton and Kilverstone and acknowledge policies already adopted. However we believe there is also an opportunity to have useful input to the new Local Plan development process which is still in the early stages of preparation in order to influence development in the wider joint Parish area over the long term

We request your help to understand the key issues you see as impacting our Parishes e.g.

- What do you like and dislike?
- What do you want to see in the future?
- What do you not want to see in the future?

This questionnaire has been prepared using comments collected from the Open Meeting held on Saturday 13<sup>th</sup> September 2014 plus a number of comments which were raised by residents and affected parties since that meeting.

**Please take the time to complete this Questionnaire and help us develop a Joint Neighbourhood Plan which truly reflects the views of the residents of our Parishes.**

Please return your completed questionnaire, by **17<sup>th</sup> April 2015**, to any of the following mail drop box locations:

### Croxton

PC Notice board - (The Street)  
Box at - No.3 Hill House Lane

### Brettenham & Kilverstone

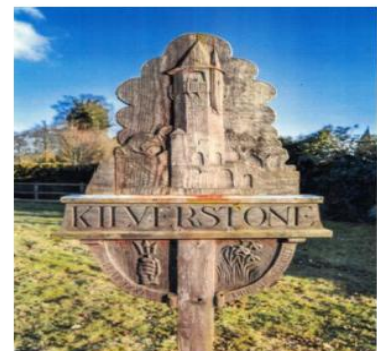
PC Notice board – Brettenham  
PC Notice board – Rushford  
PC Notice board – Kilverstone  
PC Notice board - Arlington Way



Croxton



Brettenham



Kilverstone



## **HOUSING**

The parishes of Croxton and Brettenham & Kilverstone are currently home to around **750 residents** in some **420** households. The Local Development Framework and Thetford Area Action Plan (TAAP) propose another 5,000 dwellings together with employment development within Croxton and Kilverstone during the period up to 2026 (and beyond).

In the light of this, please answer the following questions

### **Question 1**

What type of housing should be prioritised for building in the Parishes? Please rank your answers on a scale of **1 to 5** with **1** being **most important**.

- ☐ Starter homes (1 or 2 bedroom)
- ☐ Family homes (3 or more bedrooms)
- ☐ Flats
- ☐ Bungalows
- ☐ Sheltered housing
- ☐ Affordable Housing

### **Question 2**

Noting there are currently no specific areas allocated for development other than those in the SUE (please refer to map attached), should there be provision for further new homes to be built?

- ☐ Y                      ☐ N                      ☐ Have no opinion

If so would you support local residents using suitable plots in rural areas/villages?

- ☐ Y                      ☐ N                      ☐ Have no opinion

### **Question 3**

Do you feel that the existing Croxton village settlement boundary remains appropriate? Please tick any of the following you feel applicable. (*This question applies to Croxton only; please refer to Croxton village Map attached*)

- ☐ Current Settlement boundary should remain unchanged
- ☐ Current Settlement boundary should be reviewed
- ☐ Future development should only be allowed within the Settlement boundary
- ☐ Not applicable (*Brettenham & Kilverstone has no settlement boundaries*)

### **Question 4**

Do you feel your community would benefit from development in the rural countryside around it?

☐ Y

☐ N

### Question 5

What are your concerns, if any, about further housing in your parish (Croxtan. Brettenham & Kilverstone)?

Please choose as many boxes as you wish and rank your answers on a scale of **1 to 5**, with **1** being of **most concern** to you

- ☐ Overall scale of further development
- ☐ Density of new development
- ☐ Development out of character/keeping with existing area/properties
- ☐ Adequate parking provision
- ☐ Impact on existing green spaces and landscape (e.g. trees and hedgerows)
- ☐ Provision of adequate formal/informal open spaces
- ☐ Impact on existing services (e.g. GP surgery, primary/secondary schools)
- ☐ Provision of adequate new local amenities and facilities
- ☐ Increased volume of traffic on existing roads and highways network
- ☐ Provision of adequate public transport
- ☐ Not sure

Other (please comment in space below)

### Question 6

How important to you is it that any development that does take place is in keeping with the character and heritage of your community, and ensures this is maintained and supported including established hedgerows, listed buildings and open spaces, to protect the integrity of the parishes for the future'? Please circle one answer below

VERY Important1                      2                      3                      4                      5    NOT Important

## **TRANSPORT & ROADS**

### Question 7

What is your main mode of transport? Please tick one answer

- ☐ Private car
- ☐ Motor cycle/moped
- ☐ Public bus service
- ☐ Bicycle
- ☐ Rail transport
- ☐ Foot

Other – please specify below

**Question 8**

How often do you use the Public bus service?

- ☐ Daily
- ☐ Most days
- ☐ 2 x per day
- ☐ 2 – 3 times per month
- ☐ Less than once per month
- ☐ Not at all

**Question 9**

What would encourage you to use a local bus service more?

- ☐ Availability of a service
- ☐ Greater frequency of daily service
- ☐ Greater service during evenings
- ☐ Would not use a bus service

Other – please specify below

**Question 10**

What concerns do you have about the local road network in your Parish (excluding the A11)?

Please choose as many boxes as you wish and rank your answers on a scale of **1 to 5**, with **1** being of **most concern** to you

- ☐ Road safety
- ☐ Need to preserve rural roads
- ☐ Speeding / lack of speeding enforcement
- ☐ Congestion
- ☐ On street parking/driveway access
- ☐ Lack of passing places to avoid verge damage
- ☐ Inconsiderate driving of HGV traffic
- ☐ Inconsiderate driving of agricultural vehicles
- ☐ No concerns

Other – please specify below

### Question 11

What improvements do you feel most important to meet the needs of further development?

Please rank your selection on a scale of **1 to 5**, with **1** being **most important**

- ☐ Improved bus service
- ☐ More designated footpaths / cycle lanes
- ☐ More pedestrian crossings (controlled crossings, underpass or bridge where applicable)
- ☐ Reduction in on-street parking
- ☐ Road safety
- ☐ Traffic calming measures e.g. 'speed bumps', priority one-way schemes with suitable lay by
- ☐ Reduced speed limits on through routes (where applicable)
- ☐ Increased Community Facilities and Services
- ☐ Do you feel there is a case for an HGV ban in villages?

### AMENITIES & FACILITIES

### Question 12

Which facilities do you consider need to be introduced or expanded as new residential development proceeds? Please choose **five** items and rank your selection on a scale of **1 to 5**, with **1** being **most important**

- ☐ Community centre
  - ☐ Recreational/sporting facilities
  - ☐ Pre-school provision
  - ☐ Primary School provision
  - ☐ Secondary School provision
  - ☐ Play areas
  - ☐ Outdoor Gym / Exercise facilities
  - ☐ Religious provision
  - ☐ Medical Facilities
  - ☐ Mobile/Library provision
  - ☐ Post Office services (if applicable)
- New Community groups/organisations – please specify below

Other – please comment below

**Question 13**

As population grows the present primary care facilities (School Lane and Grove Lane Surgeries) will become increasingly stretched. Where do you feel increased facilities should be provided, choose more than one location if this is your view?

- ☐ Grove Lane Surgery (possibly utilising previous Cottage Hospital site)
- ☐ The Healthy Living Centre
- ☐ The new centre location proposed in the SUE (towards Tesco retail area)

***\*School Lane Surgery - not an option due to space limitations***

**Question 14**

What surgery are you registered with?

- ☐ Grove Lane Surgery
- ☐ School Lane Surgery
- ☐ Other

**Question 15**

The nearest Accident and Emergency and Hospital department is in Bury St Edmunds. Current 'out of hours' services are provided throughout Norfolk by East Anglian Ambulance services using contracted GP's and paramedics, with a base in Thetford at the Healthy Living centre.

Are you satisfied with the available Primary Care/GP out-of-hours services in Thetford?

- ☐ Very satisfied
- ☐ Satisfied
- ☐ Neither satisfied nor dissatisfied
- ☐ Dissatisfied
- ☐ Very dissatisfied
- ☐ Have not used
- ☐ Don't know

**Question 16**

If it is possible to expand out-of-hours provision in the area how do you think this would be best achieved. Please rank the following options in order of preference, with 1 being your favoured option and 3 being your least favoured option.

- ☐ Each surgery offering separate extended hours opening on some evenings and parts of weekends
- ☐ Combined local surgeries opening for longer extended hours (e.g. to 8 pm on weekdays and limited hours at weekends) from a single location.
- ☐ Walk-in GP services from one centre until 8 pm every day including weekends, using doctors other than local GPs to cover the times when surgeries are not currently open

**Question 17**

If it were possible which of the following do you feel is most important to you as a patient?

- ☐ Availability of appointment on same day
- ☐ Availability of appointment within 1 – 3 days
- ☐ Ability to see same doctor if possible (continuity)
- ☐ Ability to discuss symptoms on phone and have doctor call back

### Question 18 - Parish Churches

- a) Do you feel that the local Church, as a place of worship, meets the needs of you and your family?

☐ Not applicable

- b) Would you consider financially helping and/or giving practical help towards the upkeep of the church building?

☐ Not sure

- c) The parishes do not have local authority burial grounds but each of the 3 parishes have churches with a graveyard available to residents. Would you be prepared for the Parish Council's to support their churchyard maintenance?

☐ Not sure

## EMPLOYMENT

### Question 19

Please tick one answer for each of the following statements:

Future development should make provision for micro businesses (less than **10 employees**)

☐ Neither agree nor disagree☐ *Strongly disagree*

Future development should make provision for small businesses (less than **25 employees**)

☐ Neither agree nor disagree☐ *Strongly disagree*

Future development should make provision for small businesses (less than **50 employees**)

☐ Neither agree nor disagree☐ *Strongly disagree*

### Question 20

In making provision for any new employment land, which issues would concern you most?

Please choose **five** items and rank your selection on a scale of **1 to 5**, with **1** being **most important**

- ☐
- Adequate parking

- ☐ Noise

- ☐ Hours of operation

- ☐ Scale of business development

- ☐ Type of business

Other – please specify below

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## **GREEN SPACES**

One of the distinguishing characteristics in the Parishes is the amount of open space however we would like to know your views on the preservation of green spaces.

### **Question 21**

Do you think there should be additional recreational facilities provided in the parishes, in addition to those outlined in the proposed SUE?

☐ Yes

☐ No

☐ Don't know

### **Question 22**

Do you feel there should be additional Play areas?

☐ Yes

☐ No

☐ Don't know

### **Question 23**

In what other form would you like to see any new open green spaces provided?  
Please specify below

--

### **Question 24**

Please tick one answer for each of the following statements:

Future development should not adversely impact on existing green spaces

☐ *Strongly agree*

☐ *Agree*

☐ *Neither agree nor disagree*

☐ *Disagree*

☐ *Strongly disagree*

Future development should protect existing landscape features (trees, hedgerows, rural footpaths)

☐ *Strongly agree*

☐ *Agree*

☐ *Neither agree nor disagree*

☐ *Disagree*

☐ *Strongly disagree*

Future development should include provision for new formal/informal green spaces

☐ *Strongly agree*

☐ *Agree*

☐ *Neither agree nor disagree*

☐ *Disagree*

☐ *Strongly disagree*

### **Question 24 (continued)**

Please tick one answer for each of the following statements:

Future development should include space for allotments and/or community projects (e.g. orchard)

- ☐ *Strongly agree*
☐ *Agree*
☐ *Neither agree nor disagree*  
☐ *Disagree*
☐ *Strongly disagree*

Future development should protect and enhance existing wildlife habitats

- ☐ *Strongly agree*
☐ *Agree*
☐ *Neither agree nor disagree*  
☐ *Disagree*
☐ *Strongly disagree*

### Question 25 – Kilverstone

There are 2 Alms Houses at Kilverstone, managed by a trust. The trustee is Brettenham and Kilverstone Parish Council. Do you feel that this number of Alms Houses is adequate and if not how many do you feel needs be provided?

- ☐ Yes 2 is adequate  
☐ No 2 is insufficient  
☐ Don't know  
☐ Please circle number you feel is required    **3**       **4**       **5**

Please add any additional comments below

### OTHER MATTERS

#### Question 26 – Telecommunications

Telecommunication services in rural areas are in many instances not satisfactory. We therefore would like to know your views on the following.

Would you support the provision of better telecommunications, if this increased Parish Council Tax

- ☐ **Y**    ☐ **N**

Would you support the installation of a telephone mast, or other means to improve signal strengths?

- ☐ **Y**    ☐ **N**

Would you be prepared to pay a subscription for higher broadband speeds even if this could not be provided by fibre-optic cable (e.g. by use of a signal mast or similar)?

- ☐ **Y**    ☐ **N**

#### Question 27 – Street Lighting

How important do you feel it is for street lighting in any new development to be carbon efficient and to minimise "light pollution" (e.g. use of LED fittings) ? Please circle one answer below

VERY Important                      1                      2                      3                      4                      5    NOT Important



How long do you feel street lighting should be operated for at night ?

- ☐ During all hours of darkness
- ☐ Only during part of hours of darkness

**Question 28 – Other Suggestions**

Are there other items or issues which you feel should be included within our Joint Neighbourhood Plan? Please list these below:

**ABOUT YOU**

We do not require your personal details but please provide your postcode in the box below

We would also appreciate if you could take the time to provide the following information concerning the numbers in each age group within your household.

**Age Group No. in household**

Under 18	
18 - 30	
31 - 45	
46 - 65	
Over 65	

Do you work in Croxton, Brettenham or Kilverstone?

If so please provide the postcode of where you work, in the box below.

## **Appendix D – Questionnaire Results**

### **Question No.5**

**What are your concerns, if any, about further housing in your parish (Croxtan. Brettenham & Kilverstone)?**

#### **Doc. No.**

- 081** I don't want to see 'jam-packed' housing just as commuter, dormitory housing for Cambridge and Norwich.
- 092** I think development should be 'planned' and not left to developers housing. Above Q5 does not make communities.
- 095** What about employment? Is there enough in the area to accommodate extra people in the development?
- 280** Negative question.
- 295** As the SUE is on private land not sure what we would be losing or gaining
- 308** Need more GP's surgeries. Homes for working families, first time buyers, and older residents. Well positioned good sized houses not overlooked or tiny with space and garden.
- 324** If carried out appropriately development can make a positive contribution to the community
- 416** I believe that Parish boundary for Croxtan should be moved to Thetford bypass. Anything inside boundary should be part of Thetford Town Council. Croxtan should be rural village
- 417** The boundary for Croxtan should be the A11 bypass. The village of Croxtan should remain rural.
- 474** Close proximity of industrial areas to residential is poor. Croxtan Road is totally inadequate.  
Concentration or more people will swamp local services.
- 478** No further development!
- 535** Re Croxtan no urban development should be permitted north of A11.
- 651** Future development should take into account that people move to a village to get away from urban sprawl – I hope!

- 673** I have answered this from a village point of view. I gather all this has already been allocated in SUE.

**Question No.7**

**What is your main mode of transport?**

**Doc. No.**

- 461** No rail link in the village.  
Very limited bus service.
- 651** Tractor.

**Question No.9**

**What would encourage you to use a local bus service more?**

**Doc. No.**

- 006** Do we have a local bus timetable which shows times and routes? If so where are they available from?
- 083** Cost
- 115** No bus route in Arlington Way
- 116** No bus route in Arlington Way
- 280** Additional housing would help increase these services.
- 294** If bus passed through our village
- 295** Having one.
- 308** Not at the age to need to use the bus.
- 310** Provision of regular, reliable service to Thetford/Diss/Bury St Edmunds.
- 312** Regular, reliable service at convenient times
- 313** When I'm older and have no car.

- 416** Would not use bus service at my (present) time of life, but as time goes on and unable to drive I would depend on bus service (say in next 10 years). Cycle path into Thetford from Croxton would be useful and I would probably use it.
- 426** Occupants of Croxton appear to be elderly or commuters – thought should be given to this diversity.
- 427** Would desire morning bus service and afternoon service of 4 per day.

#### **Question 9 (cont)**

##### **Doc. No.**

- 461** However unlikely to use bus service very often.
- 474** Service is inadequate to meet modern means, takes an age to get anywhere. Services to Norwich, Bury etc. have all been recently reduced.
- 493** There needs to be more bus services to places such as Norwich or Bury more than once a day in some instances.
- 617** More affordable.
- 651** Nothing – I have a car.
- 664** Would love a better bus service that I could use more frequently so I could see friends and not have to rely on my daughter all the time.
- 666** There is no choice other than having a private car at the present time. A reasonably priced bus service would be well used, even if it was just into Thetford.
- 673** Availability of service but only when I am too old to drive!
- 674** Inability to drive a car.

#### **Question No.10**

**What concerns do you have about the local road network in your Parish (excluding the A11)?**

##### **Doc. No.**

- 006** A1008 is regularly used as a motorbike racetrack. Lorries approaching roundabout have no prior warning to slow down and several have overturned over the years. Pelican crossings should ALL be removed and replaced with Zebra crossings. Drivers to be fined for failing to stop if pedestrian has foot on the zebra.

Pedestrian push button for the Pelican, see road is clear and cross before the green light appears then drivers have to stop with no one crossing.

- 092 I would like the speed limits reduced and cycle paths.
- 295 Rubbish thrown from cars.
- 308 Speeding and volume of traffic causing congestion.
- 365 Already too much traffic on Kilverstone to Brettenham road due to Tesco Superstore with people driving too fast on a small country road.

### **Question 10 (cont)**

#### **Doc. No**

- 369 I am extremely concerned about the speed of traffic through Croxton Village, even before any further development takes place. Something needs to be done urgently BEFORE an accident happens.
- 373 Speed of vehicles. Most do not drop speed from 60mph to 30mph. There have already been near misses.
- 374 Accident waiting to happen!! Driving past the Church in Croxton from a 60mph to 30mph limit and coming down hill with a bend to the left. A high percentage still maintains their speed. When trying to get out of All Saints Court, the blind bend 70-80metrw up the hill, stopping distance is 73 metres at 60mph and 96 metres at 70mph and with HGV's much further without taking into account that it is downhill and a dry road.
- 396 The verges do not belong to house owners although Croxton has so many "bollards" to keep trucks off.  
Military vehicles through village and high speed cars using road from New Buildings, as a 'rat run' through Croxton to Thetford.
- 412 Inconsiderate driving of ALL vehicles.
- 413 Object to the assumption that only HGV and Agricultural driving may be inconsiderate.
- 448 We need to preserve rural roads, but speeding through the village is an issue of concern.
- 474 Roads and systems do not meet needs – too narrow to EU standards, too many junctions – Mundford Road / Croxton Road. Junction requires s solution.
- 489 Need paths.

- 490** Need paths.
- 578** Croxton Road is extremely congested at school times and can only get worse with increased volume.  
Accidents are waiting to happen with the number of students using inadequate pavements.
- 651** Inconsiderate car drivers!!
- 673** At present I have no real concerns, however when further development comes most of the questions concern me.

### **Question No.12**

**Which facilities do you consider need to be introduced or expanded as new residential development proceeds?**

#### **Doc. No.**

- 006** Better shopping facilities needed  
More local walking facilities – extend riverside walks up to Brettenham and improve walk to Brandon in the other direction.  
Make Shadwell stud/nunnery on edge of Thetford a forested walk/rec. area as proposed in Local Plan originally.
- 092** A community needs all of these, I can't choose 5
- 294** Rest sufficient
- 295** Youth clubs
- 311** Theatre/Cinema/Café.
- 396** Village website similar to Wretham – more approachable than a gov. model which is unfriendly and not conducive to village unity or communication.
- 403** Having chosen to live in a village and coming from a city I would much prefer to keep the status quo.
- 416** None. Secondary school provision for future is covered by capacity of Thetford Academy 2000+ spaces!

**426** This section is dependent on the type, if any, of the development considered. Elderly require different facilities to young.

**474** Youth groups, Pub?

This is ridiculous – most are No. 1 priority – sorry your system will not work.

**478** No development

**501** A village shop

**628** A pub.

**651** Give the children something to do.

Why can't I phone up to make appointment to see my GP **today** **NOT** in a months time!

**673** I hope our village will remain more or less the same – I feel we have quite enough for the present.

### **Question No.20**

**In making provision for any new employment land, which issues would concern you most?**

#### **Doc. No.**

**006** Only if close to residential areas.

**014** There is a need to consider the skills base available for business to grow

**187** No concerns apart from traffic.

**293** Not worried – already sufficient laws to take all of this into consideration i.e. Noise! (as at airports)

**295** Live and let live. No solar/wind farms, biogas plants – have given up enough prime farming land (without complaint)

**308** Need jobs to support people in new houses.

**447** If they go ahead and build this development the people will need work. The main concern is that it does not affect this village by noise pollution or light pollution.

**448** People will need work if the development proceeds. However it should not impact on the environment by causing noise or light pollution and should be in keeping with the existing architecture in rural areas.

**477** Use areas available in the area now,

- 478** Use existing capacity first.
- 651** Something long term to be proud of.
- 673** I hope there won't be any in Croxton.

**Question No.23**

**In what other form would you like to see any new open green spaces provided?**

**Doc. No.**

- 006** Country Park on Shadwell stud land at edge of town alongside Arlington Way.
- 014** Park and picnic areas
- 022** Access for pathways and cycleway.
- 023** Easier safer access to footpaths/cycle routes.

**Question 23 (cont)**

**Doc. No.**

- 024** Cycle routes.
- 025** Walk and cycle routes.
- 029** Football/cricket
- 030** Football/cricket
- 040** Woodland areas not pine, native species.
- 041** Woodland areas not pine, native species.
- 083** Wildflower meadows/areas for wildlife.
- 092** Areas managed for wildlife.
- 094** Network of footpaths and wildflower meadows.
- 095** Wild flower meadows, fitness trails, quiet areas (seated) with information about birds, trees, etc.



- 160** Running/Cycle tracks
- 293** Public paths to connect to market town of Thetford. Allotments! SUE already doing this!
- 294** Running track
- 295** River walk from Rushford to Thetford. Cycle path from SUE to Harling Road. Station and Peddars Way via Bridgham Heath – see the map.
- 308** Place to walk dog, woods, green fields, more allotments maybe?
- 312** Sports facilities
- 316** Public open spaces for walking and relaxing.
- 317** Parks
- 324** Green infrastructure should be commensurate with need and future development.
- 341** Landscaped, planted gardens with quiet areas, managed by the community
- 396** Allotments, Tennis court, Green gym, Green burial site.

**Question 23 (cont)**

**Doc. No.**

- 398** Bird watching areas and picnic areas.
- 399** Bird watching areas and picnic areas.
- 408** Leisure should not be limited to play or sport, recreation includes walking.
- 409** Leisure should not be limited to play or sport, recreation includes walking.
- 412** A recreational area within the new development would be beneficial.
- 418** Open space for walking groups to meet and park cars without inconveniencing villagers.
- 426** Again this relates to what kind of development is forthcoming. Are we talking about young children or adults?
- 427** It depends on cost of maintenance.
- 431** Duck pond and trees

**432** Wildlife pond.

**435** Parkland also needs provided.

**447** A green belt should be kept around Croxton.

**448** A green belt should be preserved around Croxton.

**474** Wooded areas, walkways and cycle ways that link up.

**475** Grass.

**476** Open park land.

**493** A return to more natural heathland instead of just grass.

**501** A bowling green

**520** Wildlife

**521** Wildlife

**531** Plenty of green spaces within the SUE to ensure we don't end up with a concrete jungle.

**532** So that we do not end up with a concrete jungle.

### **Question 23 (cont)**

#### **Doc. No.**

**542** Natural open meadowland.

**543** Natural meadows.

**555** Grass roots, football, rugby, cricket.

**556** More sports for children.

**589** Paying Field.

**594** Parks.

**651** There should be a limit n people building extensions onto their houses, therefore reducing their gardens.

- 674** Currently adequate.
- 683** Cycle track / Walking tracks.
- 688** I would like to see the Stanford training Area become open parkland with general public access.

### **Question No.28**

**Are there other items or issues which you feel should be included within our Joint Neighbourhood Plan?**

#### **Doc. No.**

- 006** Keep all future large scale housing (over 20 units) to an area of the SUE and nor allow anything outside it until SUE area is fully developed and then reassess future building areas again.
- 014** The local policing cover should be sufficient to keep increased development safe.
- 022** The feeling that this is simply a "PR exercise and the local views really don't matter/count" The basis on why I moved to the area has been overruled
- 092** While I understand you must seek out views, I would like professional planners with a proper overview to 'plan' future development with current and future needs addressed.
- 094** Retain stone curlews buffer zone.  
Ban heavy Lorries through villages.  
No blanket 20mph zones. Action needed against pavement parking.

### **Question 28 (cont)**

#### **Doc. No.**

- 095** No pavement parking very difficult to pass with buggy/wheelchair. Retain stone curlews buffer zone.  
No blanket 20mph can be more dangerous as not adhered to in other countries.
- 104** Consider new settlement boundaries for villages where no such settlement boundaries exist, in order to allow development of villages with little or no basic facilities e.g. pub, post office, shops etc., and ageing population. In other words, reinvigorate our villages!!
- 160** Extension of alcohol free public areas to minimise public disorder incidents.

- 280** Consult landowners and businesses
- 294** What are the things we like?
- 324** A detailed evidence base
- 025** Breckland Council should take on board local views more than they have in the past.
- 293** I do NOT want to see urbanisation of rural villages i.e. Leave natural (NO street furniture or street lighting) DO NOT SPOIL!
- 295** Not for rural village locations.  
 Leave rural villages alone, it's what people like and why they move to the country. More emphasis required on historical and heritage preservation. The view from Rushford paddocks along The Little Ouse valley must not be spoiled. With regards to the SUE – its all gone through consultation and planning and most of your question are already answering and Thetford Town Council are better placed to govern. It is an extension to Thetford anyway. Let the experts deal with it!  
 It would be good to enquire as to the views of the under 18's most of us 'old ones' wont see any of this.  
 These questionnaires should have been handed out and collected personally and explained.  
 Is this it? Rather incomplete from your front page cover sheet, the Open Meeting was a let down and there is no 'public' participation.
- 308** Why do we have to pay more for better phone signal and broadband, shouldn't companies or government scheme for faster broadband – most want underground better?  
 Do we need street lights? If yes all needs to stop light pollution.  
 ONLY on until 1 am
- 341** Wide roads for emergency services and adequate parking areas.

### **Question 28 (cont)**

#### **Doc. No.**

- 370** "Q6. Development should be in keeping with character and Heritage..."  
 The tranquillity of Croxton is already (and increasingly) being damaged by traffic – Speed and Quantity. The JNP should include traffic calming measures in villages and adoption of 20 mph speed limits (as is being applied to villages in many areas now)
- 396** Solar panels to benefit the whole village: reducing electricity bills and providing income.

- 412** I would prefer to see the SUE taken into Thetford and **not** be a part of Croxton, Kilverstone and Brettenham as I think our current parishes will cease to be rural and will become swallowed up with new town issues. Also your letter had so many abbreviations it was extremely difficult to understand without referring back to definitions.
- 416** Need for lights or roundabout at Croxton Road – Mundford Road junction, a safety issue.  
Need for roundabout at Kilverstone / London Road.  
Needs all of parishes inside bypass and Euston Road to be moved into Thetford town.
- 426** All issues relate to a balance between young and old. A lot of people have been driven out of Thetford itself because of lack of thought for elderly and infirm. This may also happen in villages if they are not provided for.
- 431** I think more thought should be given to the surroundings of existing property owners. The new housing development in Croxton is a disgrace and those who approved it should be ashamed of themselves. I feel extremely sorry for the residents of Harefield Road.
- 447** We feel Croxton should be preserved as a village and not joined to Thetford.  
A barrier of trees should be planted now before construction starts, along the edge of The A11 from the roundabout junction of the A134 to where the railway line meets the A11 to prevent noise and light pollution and to keep the village rural (refers to Map 1).
- 448** Croxton should be preserved as a rural village and not become an extension of Thetford.  
Trees should be planted this side (north) of the A11 noise and light pollution, and to Set a rural boundary. We would strongly oppose any development on Croxton side of the A11.
- 461** The village (see Q3) needs redrawing as some houses are split in two or excluded.  
The stone curlew area (exclusion?) seems to cover all Thetford.
- 474** Plans need to allow proper space for vehicles so that multi – use houses do not block pavements roads etc.  
Need to improve the standard of persons being encouraged to come here, becoming ‘basket case’ town.
- 477** Development not wanted.
- 618** Feel that Croxton Vicarage must be in Croxton Village Boundaries, very strange?  
Also bottom of village.

### **Question 28 (cont)**

#### **Doc. No.**

- 632** Croxton is a lovely village. Let's do our utmost to retain that image by resisting future building applications very strongly.
- 651** Turn of every other light.
- 674** Land currently used for Agriculture should be maintained for food production.
- 682** Is Croxton a parish equipped to deal with the SUE project – or should the Croxton / Thetford border be renegotiated? Would revenues from an expansion area meet or exceed costs to the parish?

### **UNSOLICITED COMMENTS - (no comments box)**

#### **Question No. 1**

**What type of housing should be prioritised for building in the Parishes?**

#### **Doc No.**

- 092** I don't have the knowledge to complete this question. I think plans should reflect need not opinion.
- 477** None
- 478** None (see Q6 below)

#### **Question No. 2 (b)**

**Noting there are currently no specific areas allocated for development other than those in the SUE (please refer to map attached), should there be provision for further new homes to be built?**

**If so would you support local residents using suitable plots in rural areas/villages?**

#### **Doc No**

- 092** Is there a need ?
- 396** Depends on where they are:if building in back yard NO, If building in open groundYES

**Question No. 3**

**Do you feel that the existing Croxton village settlement boundary remains appropriate? Please tick any of the following you feel applicable. (*This question applies to Croxton only; please refer to Croxton village Map attached*)**

**Doc No**

**092** Don't know.

**Question No. 4**

**Do you feel your community would benefit from development in the rural countryside around it?**

**Doc No**

**092** What do you mean by development? I think Thetford's infrastructure should be developed.

**396** Depends on density

**Question No. 6**

**How important to you is it that any development that does take place is in keeping with the character and heritage of your community, and ensures this is maintained and supported including established hedgerows, listed buildings and open spaces, to protect the integrity of the parishes for the future'?**

**Doc No**

**006** All Three parishes are rural. Future housing should take place along all as local plan decided upon.

**478** See answer to Q1 (Unsolicited) above.

**Question No. 9**

**What would encourage you to use a local bus service more?**

**Doc No**

**006** Bad for environment, uses fuel and wastes time.

**535** Not applicable.

**Question No. 11**

**What improvements do you feel most important to meet the needs of further development?**

**Doc No**

**0406** – Arlington Way

**0416** – Arlington Way

**365** What about existing businesses in village (farmers) who have a need for HGV vehicles having access? Not possible.

**477** No further development.

**478** None (Unsolicited) above

**651** What about Lorries going to and from farms.

**Question No. 13**

**As population grows the present primary care facilities (School Lane and Grove Lane Surgeries) will become increasingly stretched.**

**Doc No**

**006** Good idea for future housing to north.

**015** It is wrong that the Cottage Hospital, which was originally paid for by local public subscription, should not be used for public benefit.

**651** Yes use The Cottage Hospital – surely logical!!

**Question No. 14**

**What surgery are you registered with?**

**Doc No**

**412** I feel this is an irrelevant question and intrusive.



## **UNSOLICITED COMMENTS (continued)**

### **Question No. 15**

The nearest Accident and Emergency and Hospital department is in Bury St Edmunds. Current 'out of hours' services are provided throughout Norfolk by East Anglian Ambulance services using contracted GP's and paramedics, with a base in Thetford at the Healthy Living centre. Are you satisfied with the available Primary Care/GP out-of-hours services in Thetford?

### **Doc No**

**081** Never used it so have no opinion on that.

### **Question No. 16**

If it is possible to expand out-of-hours provision in the area how do you think this would be best achieved.

### **Doc No**

**035** satisfied with existing arrangement

**293** Healthy since February, already trialing Saturday emergency/urgent appointments

### **Question No. 17**

If it were possible which of the following do you feel is most important to you as a patient?

### **Doc No**

**412** All of the above are important but again **not** relevant to new development.

**673** Most of these appear to be impossible at the present.

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Would you consider financially helping and/or giving practical help towards the upkeep of the church building?

**Doc No**

**006** Within reasonable cost “C of E” still wealthiest property owner in UK!

**UNSOLICITED COMMENTS (continued)**

**Question No. 19**

Please tick one answer for each of the following statements:

Future development should make provision for micro businesses (less than 10 employees)

**Doc No**

**006(c)** Not sure exactly what you mean. Large firms should be attracted to industrial/commercial areas of town.

**295** Already SUE

**396** These answers are flawed.

A micro business working in engineering could generate noise and nuisance.

A fruit farm employing 40 people would not be at all intrusive.

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Do you think there should be additional recreational facilities provided in the parishes, in addition to those outlined in the proposed SUE?

**Doc No**

**396** In Croxton NO.

**673** Not in Croxton village.

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Do you feel there should be additional Play areas?

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Future development should include space for allotments and/or community projects (e.g. orchard)

Future development should protect and enhance existing wildlife habitats

**Doc No**

**293** But what about stone curlews?

**295** See comment Q5

**UNSOLICITED COMMENTS (continued)**

**Question No. 25 (Kilverstone)**

**There are 2 Alms Houses at Kilverstone, managed by a trust. The trustee is Brettenham and Kilverstone Parish Council. Do you feel that this number of Alms Houses is adequate?**

**Doc No**

**092** I do not have the knowledge but I would support mote alms houses if needed.

**293** Outdated in 21<sup>st</sup> Century! Liability!

**294** For local use

**295** Should be provided for local needs.

**341** More to encourage community spirit.

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**Would you support the provision of better telecommunications, if this increased Parish Council Tax**

**Would you support the installation of a telephone mast, or other means to improve signal strengths?**

**Would you be prepared to pay a subscription for higher broadband speeds even if this could not be provided by fibre-optic cable (e.g. by use of a signal mast or similar)?**

**Doc No**

**294** No mast on our church

**370** Broadband speed is good.  
Mobile reception is very poor indeed.

**531** Already have fibre optic broadband.

**293** Blot on landscape!

**Question No. 27**

**How important do you feel it is for street lighting in any new development to be carbon efficient and to minimise “light pollution” (e.g. use of LED fittings) ?**

**Doc No**

**006** If LED’s are used additional cost would be very small – less than ION bulbs would work ok.

**293** Light pollution! NOT for rural areas. Beautiful night skies! Wildlife!

**The following is a summary of the main issues and concerns/comments raised to relevant specific questions by residents of the three Parishes.**

### **Question No.5**

**What are your concerns, if any, about further housing in your parish (Croxtan. Brettenham & Kilverstone)?**

Residents expressed concern at the scale of proposed development and densities/closeness/lack of space/size of plot issues of houses leading to 'commuter dormitory' situation.

Residents questioned the issue of employment moving in tandem with house building and not increasing population growth without new employment opportunities. Development should be 'planned' and not left to developers; it is about building communities.

Residents stressed the need for increased Health facilities, including GP surgeries for all age groups including older residents

Residents strongly expressed the view that no further development should be considered north of A11 bypass as this would be destructive in terms of loss of rural communities.

This included the view that within the Parish boundaries should be retained as rural communities as this rurality is why residents move to these areas in the first place. 'Away from urban sprawl' was term used.

Residents felt close proximity of industrial areas to residential areas is poor. Croxtan Road is currently totally inadequate to support development proposed.

Introduction of more people will swamp local services.

As the SUE is on private land not sure what we would be losing or gaining

There should be no further development!

This is a negative question.

If carried out appropriately development can make a positive contribution to the community

### **Question No.7**

**What is your main mode of transport?**

Private car

**(Question 7 cont)**

Tractor

There is no rail link in the villages.

Only a very limited bus service is available.

**Question No.9**

**What would encourage you to use a local bus service more?**

Availability of a local bus timetable which show times and routes.

If this is available where are they available from?

Reasonable cost of service, more affordable.

Having any service at all.

A bus route servicing Arlington Way.

Bus route passing through/servicing villages.

Provision of regular, reliable services to Thetford/Diss/Bury St Edmunds.

Regular, reliable service at convenient times

Desire a morning bus service and afternoon service of 4 per day.

Would love a better bus service that could be used more frequently to visit friends and not have to rely on my daughter all the time.

Current service is inadequate to meet modern needs, takes an age to get anywhere.

Services to Norwich, Bury etc. have all been recently reduced.

There needs to be more bus services to places such as Norwich or Bury more than once a day in some instances.

There is no choice other than having a private car at the present time. A reasonably priced bus service would be well used, even if it was just into Thetford.

Occupants of Croxton predominantly elderly or commuters –consideration should be given to this diversity.

Would not use bus service at my (present) time of life, but as time goes on and unable to drive I would depend on bus service (say in next 10 years). Cycle path into Thetford from Croxton would be useful and I would probably use it.

Additional housing would help increase provision of these services.

**(Question No.9 cont.)**

Not at the age to need to use the bus.

When I'm older and have no car.

However, unlikely to use bus service very often.

Nothing – I have a car.

Availability of service but only when I am too old to drive!

In event of inability to drive a car.

**Question No.10**

**What concerns do you have about the local road network in your Parish (excluding the A11)?**

A1008 is regularly used as a motorbike racetrack. Lorries approaching roundabout have no prior warning to slow down and several have overturned over the years.

Pelican crossings should ALL be removed and replaced with Zebra crossings. Drivers should be fined for failing to stop if pedestrian has foot on the zebra.

Pedestrian push button for the Pelican, see road is clear and cross before the green light appears then drivers have to stop with no one crossing.

Would like the speed limits reduced and introduction of cycle paths.

Speeding and volume of traffic causing congestion are of major concern.

Already too much traffic on Kilverstone to Brettenham road due to Tesco Superstore with people driving too fast on a small country road.

Extremely concerned about the speed of traffic through Croxton Village, even before any further development takes place. Something needs to be done urgently BEFORE an accident happens.

Accident waiting to happen!! Driving past the Church in Croxton from a 60mph to 30mph limit and coming down hill with a bend to the left. A high percentage still maintains their speed. When trying to get out of All Saints Court, the blind bend 70-80metres up the hill, stopping distance is 73 metres at 60mph and 96 metres at 70mph and with HGV's much further without taking into account that it is downhill and a dry road.

The verges do not belong to house owners although Croxton has so many "bollards" to keep trucks off.

Military vehicles through village and high speed cars using road from New Buildings, as a 'rat run' through Croxton to Thetford.

Croxton Road is extremely congested at school times (Thetford Academy) and can only get worse with increased volume.  
Accidents are waiting to happen with the number of students using inadequate pavements

**(Question 10 cont)**

Roads and systems do not meet needs – too narrow compared to EU standards, too many junctions – Mundford Road / Croxton Road. Junction requires a solution.

We need to preserve rural roads, but speeding through the village is an issue of concern.

Concern with speed of vehicles. Most do not drop speed from 60mph to 30mph when entering villages. There have already been near misses.

Inconsiderate car drivers!!

Inconsiderate driving of **ALL** vehicles.

Object to the assumption that only HGV and Agricultural driving may be inconsiderate.

Action required to stop practice of rubbish being thrown from cars.

More footpaths are needed.

At present have no real concerns, however when further development comes most of the question's will become of concern.

**Question No.12**

**Which facilities do you consider need to be introduced or expanded as new residential development proceeds?**

Better shopping facilities needed

More local walking facilities – extend riverside walks up to Brettenham and improve walk to Brandon in the other direction.

Make Shadwell stud/nunnery on edge of Thetford a forested walk/rec. area as proposed in Local Plan originally.

A village shop

A pub.

Youth clubs

Theatre/Cinema/Café.



Give the children something to do.

A community needs all of these facilities, I can't choose 5

Rest are sufficient

This section is dependent on the type, if any, of the development considered. Elderly require different facilities to young.

**(Question 12 cont)**

Youth groups, Pub?

This is ridiculous – most are No. 1 priority – sorry your system will not work.

No development

None. Secondary school provision for future is covered by capacity of Thetford Academy 2000+ spaces!

Having chosen to live in a village and coming from a city I would much prefer to keep the status quo.

I hope our village will remain more or less the same – I feel we have quite enough for the present.

Why can't I phone up to make appointment to see my GP **today NOT** in a months time!

Village website similar to Wretham – more approachable than a Gov. model which is unfriendly and not conducive to village unity or communication.

**Question No.20**

**In making provision for any new employment land, which issues would concern you most?**

There is a need to consider the skills base available for business to grow

Need jobs to support people in new houses.

If they go ahead and build this development the people will need work. The main concern is that it does not affect this village by noise pollution or light pollution.

People will need work if the development proceeds. However it should not impact on the environment by causing noise or light pollution and should be in keeping with the existing architecture in rural areas.

Use areas available in the area now,

Use existing capacity first.

Only if close to residential areas.

No concerns apart from traffic.

Not worried – already sufficient laws to take all of this into consideration i.e. Noise! (as at airports)

Live and let live. No solar/wind farms, biogas plants – have given up enough prime farming land (without complaint)

Something long term to be proud of.

**(Question No.20 cont.)**

I hope there won't be any in Croxton.

**Question No.23**

**In what other form would you like to see any new open green spaces provided?**

Country Park on Shadwell stud land at edge of town alongside Arlington Way.

Park and picnic areas

Access for pathways and cycleway.

Easier and safer access to footpaths/cycle routes.

Cycle routes.

Walk and cycle routes.

Public paths to connect to market town of Thetford. Allotments! SUE already doing this!

River walk from Rushford to Thetford. Cycle path from SUE to Harling Road. Station and Peddars Way via Bridgham Heath – see the map.

Woodland areas not pine, native species.

Parks

Parkland also needs provided.

Wooded areas, walkways and cycle ways that link up.

Open park land.

Grass.

A return to more natural heathland instead of just grass.

Wildflower meadows/areas for wildlife.

Areas managed for wildlife.

Network of footpaths and wildflower meadows.

Wild flower meadows, fitness trails, quiet areas (seated) with information about birds, trees, etc.

Bird watching areas and picnic areas.

Wildlife

Wildlife pond.

Duck pond and trees

Natural open meadowland.

Natural meadows.

Running/Cycle tracks

Cycle track / Walking tracks.

### **(Question 23 cont)**

Running track

Sports facilities

A bowling green

Playing Field.

Grass roots, football, rugby, cricket.

More sports for children.

Football/cricket

Place to walk dog, woods, green fields, and more allotments maybe?

Public open spaces for walking and relaxing.

Open space for walking groups to meet and park cars without inconveniencing villagers.

Allotments, Tennis court, Green gym, Green burial site.

Leisure should not be limited to play or sport, recreation includes walking.

Landscaped, planted gardens with quiet areas, managed by the community

A recreational area within the new development would be beneficial.

Plenty of green spaces within the SUE to ensure we don't end up with a concrete jungle.

Green infrastructure should be commensurate with need and future development.

There should be a limit on people building extensions onto their houses, therefore reducing their gardens.

Again this relates to what kind of development is forthcoming. Are we talking about young children or adults?

It depends on cost of maintenance.

A green belt should be kept around Croxton.  
A green belt should be preserved around Croxton.

Would like to see the Stanford training Area become open parkland with general public access.

Currently adequate.

### **Question No.28**

**Are there other items or issues which you feel should be included within our Joint Neighbourhood Plan?**

#### **Housing**

Keep all future large scale housing (over 20 units) to an area of the SUE and nor allow anything outside it until SUE area is fully developed and then reassess future building areas again.

While I understand you must seek out views, I would like professional planners with a proper overview to 'plan' future development with current and future needs addressed.

More thought should be given to the surroundings of existing property owners. The new housing development in Croxton is a disgrace and those who approved it should be ashamed of themselves. I feel extremely sorry for the residents of Harefield Road.

Development not wanted.

Would prefer to see the SUE taken into Thetford and **not** be a part of Croxton, Kilverstone and Brettenham as I think our current parishes will cease to be rural and will become swallowed up with new town issues. Also your letter had so many abbreviations it was extremely difficult to understand without referring back to definitions.

#### **Traffic/Highways**

Ban heavy Lorries through villages.  
No blanket 20mph zones. Action needed against pavement parking.

No pavement parking very difficult to pass with buggy/wheelchair. Retain stone curlews buffer zone.

No blanket 20mph can be more dangerous as not adhered to in other countries.

Wide roads for emergency services and adequate parking areas.

“Q6. Development should be in keeping with character and Heritage...”

The tranquillity of Croxton is already (and increasingly) being damaged by traffic – Speed and Quantity. The JNP should include traffic calming measures in villages and adoption of 20 mph speed limits (as is being applied to villages in many areas now)

Need for lights or roundabout at Croxton Road – Mundford Road junction, a safety issue.

Need for roundabout at Kilverstone / London Road.

### **(Question 28 cont)**

Plans need to allow proper space for vehicles so that multi – use houses do not block pavements roads etc.

### **Policing**

The local policing cover should be sufficient to keep increased development safe.  
Extension of alcohol free public areas to minimise public disorder incidents.

### **Street Lighting**

Do NOT want to see urbanisation of rural villages i.e. Leave natural (NO street furniture or street lighting) DO NOT SPOIL!

Solar panels to benefit the whole village: reducing electricity bills and providing income.

Turn off every other light.

Do we need street lights? If yes all needs to stop light pollution.  
ONLY on until 1 am

### **Communications**

Why do we have to pay more for better phone signal and broadband, shouldn't companies or government scheme for faster broadband – most want underground better?

### **General**

The feeling that this is simply a "PR exercise and the local views really don't matter/count" The basis on why I moved to the area has been overruled

Breckland Council should take on board local views more than they have in the past.

Land currently used for Agriculture should be maintained for food production.

Retain stone curlews buffer zone.

Consult landowners and businesses

What are the things we like?

A detailed evidence base

Not for rural village locations.

Leave rural villages alone, it's what people like and why they move to the country.

More emphasis required on historical and heritage preservation. The view from Rushford paddocks along The Little Ouse valley must not be spoiled. With regards to the SUE – its all

### **(Question No. 28 cont.)**

gone through consultation and planning and most of your question are already answering and Thetford Town Council are better placed to govern. It is an extension to Thetford anyway. Let the experts deal with it!

It would be good to enquire as to the views of the under 18's most of us 'old ones' won't see any of this.

These questionnaires should have been handed out and collected personally and explained.

Is this it? Rather incomplete from your front page cover sheet, the Open Meeting was a let down and there is no 'public' participation.

Need to improve the standard of persons being encouraged to come here, becoming 'basket case' town.

All issues relate to a balance between young and old. A lot of people have been driven out of Thetford itself because of lack of thought for elderly and infirm. This may also happen in villages if they are not provided for.

Consider new settlement boundaries for villages where no such settlement boundaries exist, in order to allow development of villages with little or no basic facilities e.g. pub, post office, shops etc., and ageing population. In other words, reinvigorate our villages!!

Needs all of parishes inside bypass and Euston Road to be moved into Thetford town.

We feel Croxton should be preserved as a village and not joined to Thetford.

A barrier of trees should be planted now before construction starts, along the edge of the A11 from the roundabout junction of the A134 to where the railway line

meets the A11 to prevent noise and light pollution and to keep the village rural (refers to Map 1).

Croxton should be preserved as a rural village and not become an extension of Thetford.

Trees should be planted this side (north) of the A11 noise and light pollution, and to set a rural boundary. We would strongly oppose any development on Croxton side of the A11.

The village (see Q3) needs redrawing as some houses are split in two or excluded.

The stone curlew area (exclusion?) seems to cover all Thetford.

Feel that Croxton Vicarage must be in Croxton Village Boundaries, very strange?  
Also bottom of village.

Croxton is a lovely village. Let's do our utmost to retain that image by resisting future building applications very strongly.

**(Question No. 28 cont.)**

Is Croxton a parish equipped to deal with the SUE project – or should the Croxton / Thetford border be renegotiated? Would revenues from an expansion area meet or exceed costs to the parish?

**UNSOLICITED COMMENTS (no comments box)**

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None (see Q6 below)

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But what about stone curlews?

See comment Q5

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No mast on our church

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## **Appendix E - Scoping Document (March 2016)**

### **Summary and Structure of Draft Plan**

#### **(following initial Scoping Workshop Session – 11<sup>th</sup> February 2016)**

##### **Vision**

- Plan area is that outside of the previously identified Sustainable Urban Extension (SUE)
- Key objective to enable the maintenance, protection and enhancement of rural character of the parishes outside of the SUE.
- No allocations to be made for housing development
- Conservation led plan
- Focus on cultural, historical and natural character of the two parishes
- Key objective to maintain the individual identity of each parish
- However, recognition of the need for “social, cultural integration” with SUE with “physical integration” being seen as transport links to the SUE
- Plan period up to 2036
- Residents see their parishes as pleasant and safe places to live and wish to retain their rural character.
- Residents wish to see the “semi-rural” character of the parishes acknowledged within any development with the adoption of appropriate building styles, choice of local materials and appropriate densities and levels of green infrastructure which reflect local character

##### **Housing**

- Policies will focus on Infill, with specific emphasis on design, local materials and scale
- Policies will be underpinned by a Conservation area style appraisal – general policy - then a site specific, parish specific one
- Policies to look at and suggest enhancements – planting/materials/landscaping
- Housing requirement for both parishes considered to be satisfied by allocations already made (SUE)
- Affordable housing requirement considered to be satisfied within the SUE.

- However, with in Brettenham and Kilverstone there is a desire for more Alms houses – only 2 currently; 4-5 new ones might be appropriate under an exceptions policy.

### **Environment**

- Policy focus on Importance of undeveloped areas in the conservation area policy
- Policy focus on identifying areas for enhancement – e.g. hard or soft landscaping, planting
- Policy to be underpinned by Conservation Area style appraisal.

### **Community Facilities**

- Acknowledgement that SUE will provide any required GP, school, medical – needs to be accommodated in the SUE/or Thetford itself
- Policy Focus on open space provision – formal and informal

### **Transport**

- Acknowledgement that within both parishes there is already heavy car reliance
- Policy focus on the need to integrate bus/public transport routes to and from the SUE to the 2 rural parishes
- Rat-runs in the parishes of concern and will investigate if there are any policy options around this. – can we deal with this in a JNP?
- Policy focus for a footpath – cycle/footpath – between Croxton & Thetford – emphasis on this needing to be low impact visually
- Policy focus on low impact footpaths to give better pedestrian accessibility with Brettenham & Kilverstone.

### **Employment**

- Acknowledgement that SUE will accommodate the strategic employment needs of the parishes
- Policy focus – some support for small potential for small business
- Minor development in B&K at Kilverstone Estate; garden centre

### Brettenham & Kilverstone

- Policies to be underpinned by Conservation Area Appraisal style survey for whole of parish outside of the SUE.
- Specific policies to identify important undeveloped area, areas r opportunities for improvement or enhancement (landscaping, planting)
- Identification of buildings of cultural, historical or architectural value
- Policy focus on the potential for developing new alms houses
- Alms houses
- Policy focus on enabling Informal kick–about area
- Possible Policy focus on the Arlington Way Settlement Boundary
- Specific policy about density.
- Policy focus on gateways to the parish

### Croxton

- Conservation area appraisal for the existing conservation area
- Extend the Conservation Area Appraisal style approach to rest of parish
- Identify important features, buildings, spaces and opportunities for improvement
- Possible Policy focus on existing Play area – into the future – maintenance
- Policy focus on Footpath/cycleway to Thetford – identify route
- Policy focus on the important landscape Break, between Croxton and Thetford
- Policy focus on gateways and entrances to the parish.
- Croxton – do you need any more before 2031? – may need more.

**Appendix F - Screening Determination (April 2016)**

**Strategic Environmental Assessment  
Screening Determination  
Croxton and Brettenham & Kilverstone  
Joint Neighbourhood Plan  
April 2016**





# **Neighbourhood Planning Strategic Environmental Assessment Screening Report**

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## 1. Introduction

- 1.1. Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.
- 1.2. Establishing whether a Neighbourhood Development Plan (or 'Neighbourhood Plan') takes into account SEA is an important legal requirement. The Independent Examiner appointed to consider the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (JNP) will check that it meets the 'Basic Conditions' set out in national Planning Practice Guidance (PPG)<sup>1</sup>. One of the Basic Conditions is whether the JNP is compatible with European Union obligations. This includes the Strategic Environmental Assessment Directive. This directive is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations (2004)<sup>2</sup>. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant.
- 1.3. The legislative background set out below outlines the regulations that require the need for this screening exercise. The Screening Opinion request has been sent to the three statutory consultees of the Environment Agency, Historic England and Natural England to seek their views on its contents.

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<sup>1</sup> <http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>

<sup>2</sup> <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

## 2. Legislative Background

- 2.1. The basis for SEA legislation is European Union Directive 2001/42/EC<sup>3</sup> which requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations. The Government published 'A Practical Guide to the Strategic Environmental Assessment Directive'<sup>4</sup>, which provides more detailed guidance on how an SEA should be carried out.
- 2.2. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Council must determine if a plan requires an environmental assessment. Where the Council determines that SEA is not required, then the Council must, under Regulation 9(3), prepare a statement setting out the reasons for this determination.
- 2.3. In accordance with Regulation 9 of the SEA Regulations 2004, Croxton, Brettenham and Kilverstone Parish Councils (the qualifying body) has requested Breckland District Council (BDC), as the responsible authority, to consider whether an environmental assessment of the emerging Neighbourhood Plan is required due to significant environmental effects.
- 2.4. Whether a neighbourhood plan requires an SEA, and if so, the level of detail needed, will depend on what is proposed in the draft neighbourhood plan (see PPG Paragraph 046). The PPG suggests that SEA may be required, for example, where:
- a neighbourhood plan allocates sites for development;
  - the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and
  - the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 2.5. Sustainability Appraisal (SA) incorporates the requirements of the SEA Regulations, which implements the requirements of the SEA Directive on the assessment of the effects of certain plans and programmes on the environment. Sustainability Appraisals ensure that the potential environmental effects are given full consideration together with social and economic issues. The Government has stated that a Sustainability Appraisal is not legally required for Neighbourhood Plans, but has said that it must be demonstrated how the Neighbourhood Plan contributes to the achievement of sustainable development in the area. It is down to the qualifying body to demonstrate how its Neighbourhood Plan will contribute to achieving sustainable development. It is considered best practice to incorporate requirements of

<sup>3</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

<sup>4</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

the SEA Directive into a SA. Further guidance is contained within the Appendices of this report.

- 2.6. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012<sup>5</sup> refers to the Habitats Directive. The Regulations require Habitats Regulations Assessment (HRA) screening to be undertaken to identify if a Neighbourhood Plan would have a significant impact on nature conservation sites that are of European importance, also referred to as Natura 2000 sites. Article 6 (3) of the EU habitats Directive<sup>6</sup> and Regulation 61 of the Habitats and Species Regulations 2010<sup>7</sup> (as amended) requires that an Appropriate Assessment is carried out on any plan or project likely to have a significant effect on a European site.
- 2.7. To fulfil the legal requirements to identify if likely significant effects will occur on European sites with the implementation of the JNP, a HRA Screening Assessment should be undertaken. Details of the internationally designated sites need to be assessed to see if there is the potential for the implementation of the JNP to have an impact on the site. The Regulations state that the making of a Neighbourhood Plan is unlikely to have a significant effect on a site designated at European level for its biodiversity, however, this needs to be ascertained and this can be done at the time the screening opinion is being sought.
- 2.8. The legislation requires that where there is a 'risk' of a significant effect on a European site, either individually or in combination with other plans or projects, then there will be a requirement for the Neighbourhood Plan to progress from HRA screening to Appropriate Assessment. This is known as the precautionary principle.

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<sup>5</sup> [http://www.legislation.gov.uk/ukcsi/2012/637/pdfs/ukcsi\\_20120637\\_en.pdf](http://www.legislation.gov.uk/ukcsi/2012/637/pdfs/ukcsi_20120637_en.pdf)

<sup>6</sup> [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)

<sup>7</sup> <http://www.legislation.gov.uk/ukcsi/2010/490/contents/made>

### **3. Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan**

3.1. The JNP is in its early stages of preparation. The information provided in the SEA Screening Opinion Request, stated with certainty that:

#### **Vision**

- The JNP area covers the 2 Parish Council areas of the 3 parishes of Croxton, Brettenham & Kilverstone.
- JNP area includes the previously identified Sustainable Urban Extension (SUE), which is subject to the adopted Thetford Area Action Plan.
- Overarching need to integrate the SUE into the life of the residents of the 2 parish council areas.
- Key objective to enable the maintenance, protection and enhancement of rural character of the parishes albeit acknowledging the SUE development.
- No allocations to be made for housing development.
- Conservation led plan.
- Focus on cultural, historical and natural character of the two parish council areas.
- Key objective to maintain the individual identity of each parish.
- However recognition of the need for “social, cultural integration” with SUE, with “physical integration” being seen as transport links to the SUE.
- Plan period up to 2036.
- Residents see their parishes as pleasant and safe places to live and wish to retain their rural character.
- Residents wish to see the “semi-rural” character of the parishes acknowledged within any development with the adoption of appropriate building styles, choice of local materials and appropriate densities and levels of green infrastructure which reflect local character.

### Housing

- Policies will focus on infill with specific emphasis on design, local materials and scale.
- Policies will be underpinned by a conservation area style appraisal – general policy – then site specific and parish one.
- Policies to look at and suggest enhancements – planting, materials, landscaping.
- Housing requirement for both parish council areas considered to be satisfied with allocations already made (SUE).
- Affordable housing requirement considered to be satisfied within the SUE. However within Brettenham and Kilverstone there is a desire for more Alms houses – only 2 currently; 4-5 new ones might be appropriate under an exceptions policy.

### Environment

- Policy focus on Importance of undeveloped areas in the conservation area.
- Policy focus on identifying areas for enhancement – e.g. hard or soft landscaping, planting.
- Policy to be underpinned by Conservation Area style appraisal.

### Community Facilities

- Acknowledgement that increase in population arising from the SUE will drive the need for additional primary care, education, social (GP practice, schools and community centres/play areas etc.) but the new facility locations within the parish council areas needs to be considered.
- Policy Focus on open space provision – formal and informal.

### Transport

- Acknowledgement that within both parish council areas there is already heavy car reliance.
- Policy focus on the need to integrate bus/public transport routes to and from the SUE to the 2 rural parish council areas.
- Rat-runs in the parishes are of concern and will investigate if there are any policy options around this. – can we deal with this in a JNP?
- Policy focus for a reduced speed limit control to safeguard cycle route defined in Thetford Area Action Plan between Croxton & Thetford – emphasis on safety for pedestrians and cyclists.

- Policy focus on low impact footpaths to give better pedestrian accessibility with Brettenham & Kilverstone.

#### **Employment**

- Acknowledgement that SUE will accommodate the strategic employment needs of the parishes.
- Policy focus – some support for small potential for small business.
- Minor development in B&K at Kilverstone Estate; garden centre.

#### **Croxton**

- Conservation area appraisal for the existing conservation area.
- Extend the Conservation Area Appraisal style approach to rest of parish.
- Identify important features, buildings, spaces and opportunities for improvement.
- Possible policy focus on existing Play area – into the future – maintenance.
- Policy focus on the important landscape Break, between Croxton and Thetford.
- Policy focus on gateways and entrances to the parish.
- Identification of buildings of cultural, historical or architectural value in addition to those already recognised.
- Specific policy about density.

#### **Brettenham & Kilverstone**

- Policies to be underpinned by Conservation Area Appraisal style survey for whole of parish outside of the SUE.
- Consideration of the implications of the only settlement boundary [in Brettenham] around Arlington Way.
- Specific policies to identify important undeveloped area, areas for opportunities for improvement or enhancement (landscaping, planting).
- Identification of buildings of cultural, historical or architectural value.
- Policy focus on the potential for developing new alms houses.
- Policy focus on enabling informal kick-about area.
- Specific policy about density.
- Policy focus on gateways to the parish.



## 4. SEA Screening

4.1. The process for determining whether or not an SEA is required is called screening.

In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the SEA Directive and Schedule I of the SEA Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: The Environment Agency, Natural England and Historic England.

4.2. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out in Table 1 below:

**Figure 1: Criteria for Determining the Likely Significance of Effects.**

1. The characteristics of plans and programmes, having regard, in particular, to
  - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
  - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
  - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development, - environmental problems relevant to the plan or programme,
  - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
  - the probability, duration, frequency and reversibility of the effects,
  - the cumulative nature of the effects,
  - the trans-boundary nature of the effects,
  - the risks to human health or the environment (e.g. due to accidents),
  - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - the value and vulnerability of the area likely to be affected due to:
    - special natural characteristics or cultural heritage,
    - exceeded environmental quality standards or limit values,
    - intensive land-use,
  - the effects on areas or landscapes which have a recognised national, Community or international protection status.

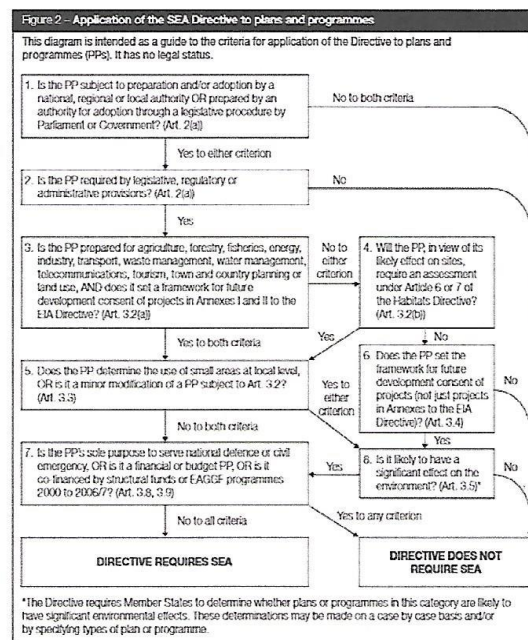
Source: Annex 11 of SEA Directive 2001/42/EC



## 5. Assessment

5.1. The SEA screening is a two stage process. The first part considers the Neighbourhood Plan against the SEA assessment criteria set out in the national guidance, 'A Practical Guide to the Strategic Environmental Assessment Directive'<sup>8</sup>. The second part of the assessment considers whether the JNP is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004<sup>9</sup>.

5.2. The process shown has been undertaken and the findings can be viewed in the figure below and in Table 1 which follows. This sets out how the SEA Directive should be applied.



(Source: Annex 11 of SEA Directive)

**Table 1: Application of the SEA Directive to the Croxton and Brettenham & Kilverstone Neighbourhood Plan**

### Assessment 1: Establishing the need for SEA

<sup>8</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>9</sup> [http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf)

STAGE	Y/N	REASON
1. Is the Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the JNP is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The JNP is being prepared by Croxton, Brettenham and Kilverstone Parish Councils (as the “relevant bodies”) and will be “made” by Breckland District Council as the Local authority subject to passing an independent examination and community referendum. The preparation of Neighbourhood Plans are subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012, the Neighbourhood Planning (referendums) Regulations 2012, and the Neighbourhood Planning (General) (Amendment) Regulations 2015.
2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art.2(a))	Y	Whilst the Neighbourhood Plan is not a requirement of the Town and Country Planning Act as amended by the Localism Act 2011, it will be “made” and eventually form part of the Development Plan for the District. These are directed by legislative processes and it is important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	<p>A Neighbourhood Plan can include these policy areas and could provide, at a Neighbourhood Area level, the framework for development that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are ‘excluded’ development for Neighbourhood Plans (as set out in Section 61(k) of the Town and Country Planning Act 1990 (as amended)).</p> <p>The JNP is prepared to set out a framework for town and country planning and land use within the parishes of Croxton, Brettenham and Kilverstone. The strategic framework for development is set by the adopted Core Strategy and the emerging Local Plan of the Breckland District Council. The JNP seeks to align and be in general conformity with this.</p> <p>The JNP does not anticipate being the tool to manage development of the scale and nature envisaged by Annex I and Annex II of the EIA Directive.</p>
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the habitats Directive?(Art.3.2(b))	N	<p>A Neighbourhood Plan could potentially have impacts on sites covered by the Habitats Regulations.</p> <p>XXX XXXXXXXXXXXXXXXXXXXX</p> <p>A Habitats Regulation Assessment Screening Report (2013) and the Assessment of the Breckland Local Plan at</p>

		Preferred Directions stage (2015) were carried out as part of Breckland District Council's emerging Local Plan.
5. Does the Neighbourhood Plans determine the use of small areas at local level, Or is it a minor modification of a PP subject to Art 3.2? ( Art3.3)	Y	A Neighbourhood Plan can determine the use of small areas at a local level. The JNP proposes to include policies relating to the location of sustainable development, but does not propose to specifically allocate land for development.
6. Does the Neighbourhood Plan set the framework for future development consent of Projects (not just projects in Annexes to the EIA Directive)? ( Art 3.4)	Y	Once 'made', a Neighbourhood Plan forms part of the statutory Development Plan and will be used in the determination of planning applications in the Neighbourhood Area. Therefore, it sets the framework for future developments at a local level.
7. Is the Neighbourhood Plans sole purpose to serve national defence or civil emergency, OR is it financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/? ( Art.3.8,3.9)	N	The Neighbourhood Plan does not deal with these categories.
8. Is it likely to have a significant effect on the environment	N	The Neighbourhood Plan seeks general conformity with the adopted Core Strategy and regard to the emerging Local Plan. No specific development is proposed through the plan, nor is land allocated for development through the plan. It is therefore considered that the plan would not have a significant effect on heritage assets, landscape, biodiversity interests or areas of flood risk.

The Environment Agency, Natural England and Historic England were consulted on the requirement for SEA for the JNP. The responses received are attached in Appendix 3.

**SEA Screening Stage 2: SEA Directive Article 3(5) Annex II – Application of Criteria for determining the likely significance of effects of a Neighbourhood Plan**

Table 2 below sets out the assessment against the Strategic Environmental Assessment criteria for the JNP. This is to determine whether the implementation of the Neighbourhood Plan will have a significant effect on the environment. This criteria against which the screening is carried out are taken directly from Annex II of the European Union Directive 2001/42/EC (also known as the SEA Directive), as required by Article 3(4).

**Table 2: SEA Screening Stage 2 - Assessment of the Likelihood of Significant Effects on the Environment**

Criteria in Annex 11 of the SEA Directive	Response	Is there a significant effect?
(1) Characteristics of the plan and programmes, having regard, in particular, to:		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size, and operating conditions or by allocating resources;	The strategic framework for development is set by the adopted Core Strategy and the emerging Local Plan of Breckland District Council. The JNP seeks to align and be in general conformity with this.	No
The degree to which the plan or programme influences other plans or programmes including those in a hierarchy;	The Neighbourhood Plan will be adopted alongside the higher order Local Plan and form part of the District's Development Plan. The JNP will expand upon some of the emerging Local Plan policies, providing supplementary information on a local scale.	No
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	Any development that comes forward through the JNP will be subject to environmental considerations of the Core Strategy and the Local Plan when adopted. These policies have been subject to sustainability appraisal, and are in place to ensure that sustainable development is achieved.	No
Environmental problems relevant to the plan or programme;	There are not considered to be any significant environmental problems which are specific to the area, above and beyond those considered and addressed in the Local Plan. The JNP may include policies which provide additional environmental protection.	No



The relevance of the plan or programme for the implementation of community legislation on the environment (e.g plans and programmes linked to waste management or water protection).	The implementation of community legislation is unlikely to be significantly compromised by the JNP.	No
<b>(2) Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
The probability, duration, frequency, and reversibility of the effects;	The JNP is a long-term plan up to 2036. It does not necessarily seek to allocate sites for growth. However, potential for additional residential development opportunities are likely in relation to a proposed Brettenham Settlement boundary and for the development of further Alms houses through an exceptions policy which would introduce further housing development opportunities. There are also proposals for the location of education and care facilities that have the potential for effects. Such policies would have a very high probability of residential development which would have potential permanent effects.	Yes
The cumulative nature of the effects; -	It is considered unlikely that the degree of development proposed through the Neighbourhood Plan in combination with the Core Strategy and the emerging Local Plan will introduce significant environmental effects. Whilst both documents are being written, the Local Plan will be subject to full SEA and Habitats Regulations Assessment. A Sustainability Appraisal is recommended as part of the Neighbourhood Plan process.	No
The transboundary nature of the effects;	The impacts beyond the parish are unlikely to be significant.	No
The risks to human health or the environment (e.g. due to accidents);	The JNP is unlikely to produce any significant effects.	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan covers the parishes of Croxton, Brettenham and Kilverstone with a population of 1,000 (Census 2011). The spatial extent and the magnitude of the population affected are not considered significant for the purpose of the SEA.	No

<p>The value and vulnerability of the area likely to be affected due to:</p> <p>i) Special natural characteristics or cultural heritage;</p> <p>ii) Exceeded environmental quality standards or limit values</p> <p>iii) Intensive land use</p>	<p>i) The Neighbourhood Plan area and adjacent areas contain a number of environmental designations. The Neighbourhood Plan will however conform to the Local Plan, which provides protection to these environmental characteristics to ensure that they are not vulnerable to significant impacts from development. However, there are potential effects from other policy proposals that are not covered in detail in the Local Plan.</p> <p>ii) The Neighbourhood Plan is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water, and soil quality.</p> <p>iii) The Neighbourhood Plan is unlikely to bring forward development of an extent that would result in a significant intensification of Local land Use.</p>	<p>Yes</p> <p>No</p> <p>No</p>
<p>The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The Neighbourhood Plan Area includes designations which reflect the cultural and heritage value of the area such as listed buildings and conservation area. The environmental effects on areas of biodiversity designations have been considered through the emerging Local Plan.</p>	<p>No</p>

## 6. Screening Outcome

- 6.1. The assessment shown above identifies that based on the information available to date, there are unlikely to be any significant environmental effects from the implementation of the proposals in the emerging JNP.
- 6.2. The Environment Agency, Historic England and Natural England have responded to the Screening Opinion request and their responses are contained in Appendix 3. Their responses are based on the information provided on 31<sup>st</sup> March 2016 in the Screening Opinion request dated 20<sup>th</sup> March 2016.
- 6.3. Historic England and the Environment Agency do not consider that an SEA will be required. Natural England has responded stating that they consider an SEA would be required in view of the proximity to the proximity of three SSSI's, the Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC).
- 6.4. Having reviewed the criteria, the Council has concluded that the emerging JNP is likely to have a significant environmental effect and accordingly will require a Strategic Environmental Assessment. The main reasons for this conclusion are:
  - The proximity of sites protected sites and the plans' proposed consideration of locations for education and care facilities across the parishes.
  - The potential for density policies across the plan area and changes to residential settlement boundaries and Alms House development in relation to Brettenham.
- 6.5. This report is based on the Screening Opinion request of 20<sup>th</sup> March 2016. The Neighbourhood Plan at this stage is emerging. Should the contents differ from that described in the Screening Opinion Request of 20<sup>th</sup> March, there may be a requirement to revisit this Screening Opinion.
- 6.6. This report has been issued to the Parish Councils, Historic England, Natural England and the Environment Agency. A copy of the report will be available for inspection at Breckland Council Offices, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

## Appendix 1

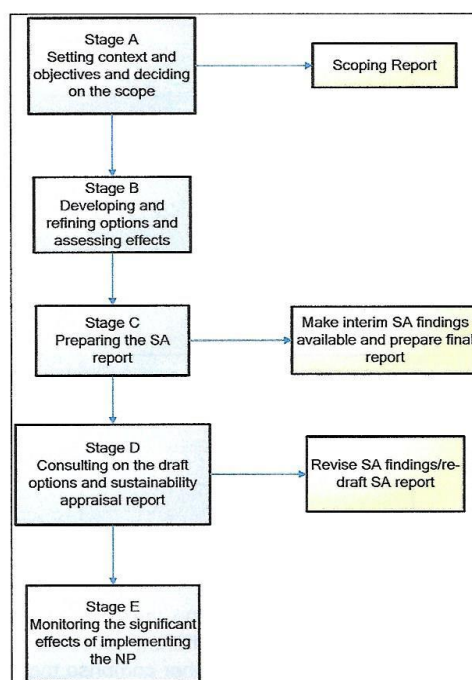
### Breckland District Council – Neighbourhood Plan Sustainability Appraisal/Scoping Report Guidance

One of the documents that the council recommends Neighbourhood Planning groups produce in support of Neighbourhood Plans is a Sustainability Appraisal. A Sustainability Appraisal is a systematic process undertaken during the preparation of a plan or strategy, as required by the Planning and Compulsory Purchase Act 2004 (S19[5]). There is also a requirement for Development Plan Documents to undergo an environmental assessment, (known as a Strategic Environmental Assessment) under European Directive 2001/42/EC (transposed into UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004). It is intended that the Sustainability Appraisal incorporates the Strategic Environmental Assessment in accordance with the Act and Regulations. This means that in addition to environmental issues, on which a Strategic Environmental Assessment focuses, social and economic matters will also be addressed as part of the overall assessment of sustainability, within a single joint appraisal.

This can be approached in five stages as set out in Figure 1 below. The results of which will be two documents, a Scoping Report (produced at Stage A) and a Sustainability Appraisal Report (produced from Stage C onwards).

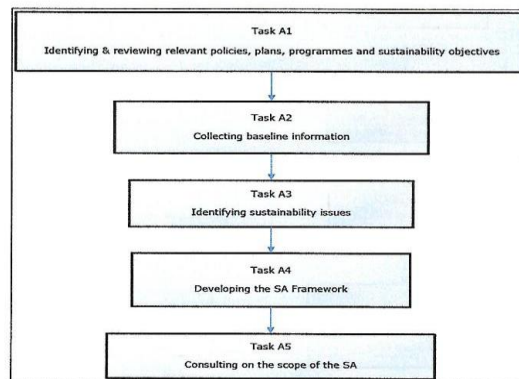


Figure 1 – Stages in producing a Sustainability Appraisal



Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report. The evidence base presented in the Scoping Report includes an analysis of the relevant policy context: a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address. Stage A can be broken down into five further sections (see Figure 2) which once completed will produce the scoping report.

Figure 2: Stage A Scoping Tasks



Stage B in the SA process involves undertaking the appraisal itself. This involves identifying and evaluating the impacts of the different options to the plan makers as well as the preferred option/policies which together comprise the plan. The appraisal is organised around the framework developed in the Scoping Report. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.

Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the 'Environmental Report' under the 'SEA Directive'). The full SA Report should be published for consultation alongside the 'pre-submission' version of the Neighbourhood Plan.

Stage D in the SA process involves consulting on the 'pre-submission' version of the plan and the accompanying SA Report; however, as stated above, SA reports can be prepared to accompany consultation on earlier versions of the plan.

Stage E in the SA process involves monitoring the adopted plan including its sustainability impacts; this is done through the Local Plan and the Council's Annual Monitoring Report (AMR).

**Please note it is advised that all Neighbourhood Plans created within Breckland District Council's administrative area are accompanied by a Sustainability Appraisal.**

There is a requirement for certain information to be contained in the report that is the same across all SA's that are produced. There are also sections that need to be specific to the Neighbourhood Plan Area and Plan.

Some specific information will be included in the Council's Sustainability Appraisals, however for some of the information required to create the spatial portrait and update the information you will be required to search different sources to gain the information that you require. We have compiled a list that contains websites and resources that you will find useful. Please see below;

**Potential Information Sources for Sustainability Appraisal**

Anglian Water – [www.anglianwater.co.uk](http://www.anglianwater.co.uk)

Audit Commission – [www.audit-commission.gov.uk](http://www.audit-commission.gov.uk)

Census 2001/ 2011 – [www.ons.gov.uk](http://www.ons.gov.uk)

Defra - <http://www.airquality.co.uk>

Historic England – [www.english-heritage.org.uk](http://www.english-heritage.org.uk)

Environment Agency – [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Local Authority Annual Monitoring Report (AMR) – contact your local authority

Local Authority evidence base – <http://www.breckland.gov.uk/content/document-library-publication>

Natural England – [www.naturalengland.org.uk](http://www.naturalengland.org.uk)

Norfolk Biodiversity Partnership – [www.norfolkbiobiodiversity.org](http://www.norfolkbiobiodiversity.org)

Norfolk Insight – [www.norfolkinsight.org.uk](http://www.norfolkinsight.org.uk)

NOMIS (official labour market statistics) - <http://www.nomisweb.co.uk>

For every policy or emerging policy that is to be included within a neighbourhood plan, there is a requirement to assess the impacts that this is likely to have from an economic, environmental and social aspect. The framework should assist you to decide which policies should be taken forward and which, if any, should not be.

This information is intended as a guide, however each Neighbourhood Planning Group are free to develop their own approach. However, the advice is intended to help you structure the workload and help guide you through this process.

## Appendix 2: Sustainability Framework

The Council has an adopted Local Plan (2009) and is advanced in the production of a new Single Local Plan. Neighbourhood Plans are required to be in general conformity with the Local Plan. As such the accompanying SA is in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. The strategies and policies were tested against 17 sustainability objectives (and accompanying questions) as published in the 2009 SA

As part of the emerging Local Plan a Scoping Report (2013) was required as part of the SA process which involved setting the context for the appraisal by considering environmental, social and economic baseline information, and relevant plans and programmes. These were refined in the interim SA Report (2014) and this included the identified key sustainability issues and characteristics and outlined the SA framework, which will be used in appraising the Local Plan. The emerging SA framework consists of 19 objectives that aim to meet the key social, environmental and economic issues for the District. These key issues, characteristics and SA objectives are grouped under sustainability topics and listed below:

### Sustainability Appraisal Framework - Core Strategy (adopted).

Sustainability Appraisal Objective	Decision making (Appraisal) questions	Detailed Site Specific Appraisal Questions?
1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings.	Will it use land that has been previously developed?	Is the land mostly brownfield/previously developed? (yes=+, no=-)
	Will it use land efficiently?	n/a dependent on type and design of development not location
	Will it protect and enhance the best and most versatile agricultural land?	Is the site on high grade land (1,2,3)? (yes=+, no =-)
2. Limit water consumption to the capacity of natural processes and storage systems.	Will it reduce water consumption?	n/a dependent on type and design of development not location
	Will it conserve groundwater resources?	Would the development of the site have the possibility to harm a protected aquifer? (y=+, n=+)
3. Reduce contributions to climate change.	Will it lead to an increased proportion of energy needs being met from renewable sources?	n/a dependent on type and design of development not location
	Will it reduce the emissions of greenhouse gases by reducing energy consumption?	n/a dependent on type and design of development not location. Reduction of greenhouse gases and energy consumption by limiting travel is highlighted below
	Will it improve air quality?	Is it in a AQMA (y=+, n=0)  (does not apply to open space allocation proposals)
	Will it reduce traffic volumes?	Is the site within 800m of a school? (y=+, n=-) (Residential allocations only)
		Is the site within 300m of convenience shopping? (y=+, n=-) (Residential allocations only) (figure from PPS6)
		Is the site within 800m of employment opportunities? (y=+, n=-) (Residential allocations only)
		Is the site within 800m of primary health care facilities? (y=+, n=-) (Residential allocations only)



Sustainability Appraisal Objective	Decision making (Appraisal) questions	Detailed Site Specific Appraisal Questions?
		only)
		Is the site within 800m of residential areas? (y=+, n=-) (not applicable to residential allocation proposals)
		Is the site connected by cycle links? (y=+, n=-)
	Will it support travel by means other than the car?	Is the site accessible by regular (daily) public transport? (y=+, n=-)
		Is the site within 30 minutes public transport time of retail provision, employment areas, and primary health care facilities? (Residential allocations only) (y=+, n=-)
4. Minimise waste production and support the recycling of waste.	Will it reduce household waste?	n/a dependent on type and design of development not location
	Will it increase waste recovery and recycling?	Is the site 2km from a household waste recycling plant? (y=+, n=0)
5. To avoid, reduce and manage flood risk.	Will it be at risk of flooding?	Is the site within EA flood zone 2 or 3 or a SFRA defined flood zone (1 in 100yr risk)? (y=-, n=+)
	Will it contribute to a higher risk elsewhere?	Is the site within EA flood zone 2 or 3 or a SFRA defined flood zone (1 in 100yr risk)? (y=-, n=+)
		Is the site within or adjacent to EA flood zone 2 or 3 or a SFRA defined flood zone (1 in a 100yr risk)? (y=-, n=+)
6. Protect, conserve, enhance and expand biodiversity.	Will it protect, maintain and enhance sites designated for their nature conservation interest?	Would it result in a direct loss of all or part of the designated site? (y=-, n=0) (for SPA, SAC and Ramsar designations, HRA applies)
		Is the site adjacent to a designated site? (y=-, n=0) (for SPA, SAC and Ramsar, HRA applies)
	Will it conserve and enhance species, diversity and avoid harm to protected species?	Will it involve the loss of trees and hedgerows? (y=-, n=0)
		Will it involve the loss of a Norfolk Biodiversity Action Plan habitat? (y=-, n=0)
		Will it enhance connectivity of habitats (consistent with Norfolk Econets project)? (y=+, n=0)
7. Maintain, enhance and preserve the distinctiveness and diversity of landscape and townscape character.	Will it maintain and enhance the distinctiveness of landscape and townscape and character?	Is the site within a landscape that has moderate-high or high sensitivity to change as defined in the Breckland Settlement Fringe Landscape Assessment? (y=-, n=+)
		Will it damage the character of the landscape/townscape? (y=-, n=+)
	Will it maintain and enhance the character of settlements?	Does it involve the re-use or re-development of derelict buildings? (y=+, n=-)
	Will it protect and enhance open spaces of amenity and recreational value?	Would it involve the loss of designated open space? (y=-, n=+)
8. Conserve and where appropriate enhance the historic	Will it protect or enhance sites, features of historical, archaeological, or cultural	Will it result in a loss of or damage to a listed building or damage to a setting of a listed

Sustainability Appraisal Objective	Decision making (Appraisal) questions	Detailed Site Specific Appraisal Questions?
environment.*	interest  (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?	building? (y=, n=+) Would it lead to a loss or damage to a historic park and garden or damage to the setting of a historic park and garden? (y=, n=+) Would it fail to preserve or enhance a conservation area or the setting of a conservation area? (y=-/?, n=0) Would it result in a loss of, or damage to a Scheduled Ancient Monument or the setting of a Scheduled Ancient Monument? (y=, n=0) Would it lead to a loss of or damage to a designated geological site? (RIGS) (y=, n=0) Would it lead to loss of or damage to a potential archaeological site? (y=, n=0)
9. Improve the health and well being of the population.	Will it increase life expectancy?  Will it improve access to essential services such as health facilities?  Will it encourage healthy lifestyles, including travel choices?	Is the site within a AQMA? (y=, n=0) Is it within or adjacent to a Hazardous Installation Consultation Area? (y=, n=0) Is the site within 1200m of outdoor playing space or sports facilities? (y=+, n=-) (NPPFA standards) Is the site within 30 minutes public transport time or walking time of a primary health care facility? (y=+, n=0) (Norfolk LTP) Would it result in a loss of outdoor playing space or sport facility? (y=, n=0) Would it lead to an increase in outdoor playing space or sport facility? (y=+, n=0) Is the site within walking distance of a school or place of employment (1000m max)? (y=+, n=-) (residential allocation proposals only)
10. Reduce and prevent crime, and reduce the fear of crime.	Will it reduce actual levels of crime? Will it reduce fear of crime?	n/a dependent on type and design of development not location n/a dependent on type and design of development not location
11. Improve the quality and quantity of accessible open space.	Will it improve accessibility to open space?  Will it improve the quality and quantity of accessible open space?	Is it within 1200m of a residential area? (for outdoor playing space allocation proposals only) (y=+, n=-) Is it within 1200m of outdoor playing space? (for residential allocation proposals only) (y=+, n=-) Would it involve an increase in open space provision? (y=+, n=0) Would it involve a decrease in open space provision? (y=, n=+)
12. Improve the quality, range and accessibility of essential services and facilities.	Will it improve accessibility to key local services and facilities, including health, education, leisure, (village shops, post	Is it within walking distance (1000m) or 75 minute public transport of a high school ? (y=+, n=-)

Sustainability Appraisal Objective	Decision making (Appraisal) questions	Detailed Site Specific Appraisal Questions?
	offices pubs)?	Is it within walking distance (1000m) or 30 minute public transport of a doctors surgery? (y=+,n=-)
		Is it within 1000m of a primary school? (y=+, n=-)
		Will it increase provision of local services? (y=+,n=-)
	Will it improve accessibility to shopping facilities?	Is it within walking distance (300m) or 30 minutes public transport of a convenience store? (y=+, n=-) (residential allocation proposals only)
		Is it within walking distance (300m) or 30 minutes public transport of a town centre? (y=+, n=-) (residential allocation proposals only)
		Is it in the town centre? (y=+, n=-) (retail allocations only)
13. Redress inequalities related to age, gender, disability, race, faith, location and income.	Will it reduce poverty and social exclusion in those areas most affected?	Is it connected to public transport and within 30 minutes public transport time of retail provision, and employment? (y=+, n=-)
		Will it increase services in a ward within the 20% most deprived wards in England? (y=+, n=0)
	Will it improve affordability to essential services and facilities at home?	n/a
	Will it improve relations between people from different backgrounds and social group?	n/a
14. Ensure all groups have access to affordable, decent and appropriate housing.*	Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?	Is it an allocation for housing? (y=+,n=0)
	Will it reduce the number of unfit homes?	Will it involve the redevelopment of unfit homes? (y=+,n=0)
	Will it reduce housing need?	Is the allocation proposal for housing? (y=+,n=0)
	Will it meet the needs of the travelling community?	Is the allocation for a gypsy and traveller site? (y=+,n=0)
15. Increase the vitality and viability of existing town centres.	Will it increase vitality of existing town centres?	Is it in the town centre? (y=+,n=0)
	Will it increase viability of existing town centres?	Is it in the town centre? (retail and leisure allocations only) (y=+,n=-)
		Is it within 300m or 30 minute public transport time of the town centre? (residential allocation proposals only) (y=+,n=0)



Sustainability Appraisal Objective	Decision making (Appraisal) questions	Detailed Site Specific Appraisal Questions?
16. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	Will it support and improve education?	Is the allocation for an educational establishment? (y=+, n=0)
	Will it encourage employment and reduce unemployment overall?	Is the allocation proposal for employment land? (y=+, n=0)
	Will it improve access to employment/ access to employment by means other than car?	Is the site within 800m or 30 minute public transport time of residential areas? (for employment use allocation proposals only) (y=+, n=-)
		Is the site within 800m or 30 minute public transport time of residential areas? (for residential) allocation proposals only) (y=+, n=-)
17. Improve the efficiency, competitiveness and adaptability of the local economy.	Will it improve business development and enhance competitiveness?	Is it in an area with a deficiency of employment land ? (for employment use allocation proposals only) (y=+, n=0)
	Will it make land and property available for business development?	Is the allocation proposal for employment land? (y=+, n=0)
		Would it result in a loss of employment land? (y=-, n=+)
	Will it support sustainable tourism?	Is the allocation proposal within a town or local service centre or accessible by public transport? (y=+, n=-)
	Will it encourage rural economy and diversification?	Is the allocation in the rural area? (employment and tourism proposals only) (y=+, n=0)



Sustainability Appraisal Framework Emerging Local Plan (Winter 2015).

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of on site resources to minimise the impacts on the environment and safeguard resources for the future generations.	Will it use land that has been previously developed?	Site includes a house or garden/previous use (y=+, n=0)
		Will it use land efficiently?	Close to the settlement boundary/ brownfield/ not
		Will it protect and enhance the best and most versatile agricultural land?	Grade 1,2,3 (y=, n=+)
		Will it use brownfield land?	NPPF definition (exclude garden) (y=+, n=0)
		Will it recycle on site resources?	Dependent on type and design of development, not
	2. Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.	Will it reduce water consumption?	Dependent on type and design of development, not location.
		Will it conserve groundwater resources?	Would the development of the site have the possibility to harm a protected aquifer (y=-, n=+)
		Will it maintain or enhance water quality?	Dependent on type and design of development, not location.
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	Will it reduce water consumption?	Dependent on type and design of development, not location.
		Will it conserve groundwater resources?	Would the development of the site have the possibility to harm a protected aquifer (y=-, n=+)
		Will it maintain or enhance water quality?	Dependent on type and design of development, not location.
Climate change and air pollution	4: Minimise the production of waste and support the recycling of waste.	Will it reduce waste?	Dependent on type and design of development, not location.
		Will it re-use waste?	Dependent on type and design of development, not location.

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
		Will it enable composting of waste?	Dependent on type and design of development, not location.
		Will it enable recycling of waste?	Is the site 2km from a household waste recycling plant? (y=+, n=o)
		Will waste be recovered in other ways for other uses?	Dependent on type and design of development, not location.
		Will it increase waste going to landfill?	Dependent on type and design of development, not location.
		Will it encourage the re-use and recycling of aggregates?	Dependent on type and design of development, not location.
	5. Reduce contributions to climate change and localised air pollution.	Will it lead to an increased proportion of energy needs being met from renewable sources?	Dependent on type and design of development, not location.
		Will it reduce the emissions of greenhouse gases by reducing energy consumption?	Dependent on type and design of development, not location.
		Will it improve air quality?	Is it in a AQMA (y=--, n=o)
		Will it reduce traffic volumes?	Is it within 300m of convenience shopping ? Is it within 800m of a school? (y=+, n=o)
		Will it support travel by means other than single occupancy car?	Is the site within 800m of a bus stop (y=+, n=o)
	6. To adapt to climate change and avoid, reduce and manage flood risk.	Will it increase risk of flooding?	Is the site within an EA flood zone 2 or 3 or a SFRA defined flood zone (1 in 100yr risk)? (y=--, n=+)

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
		Will it contribute to a higher risk elsewhere?	Is the site adjacent to an EA flood zone 2 or 3 or a SFRA defined flood zone (1 in 100yr risk)? (y=, n=+)
		Will it attenuate the flow and run off of water?	Dependent on type and design of development, not location.
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	Will it protect, maintain and enhance sites designated for their nature conservation interest?	Would it result in the direct loss of all or part of the designated site ? Is the site adjacent to a designated site ? (SPA, SAC, Ramsar, HRA) (y=, n=+)
		Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species?	Will it involve the loss of a Norfolk Action Plan Habitat (County Wildlife n=+)
		Will it promote and conserve geodiversity?	Will it involve the loss of trees and hedgerows ? (y=, n=+)
	8. Protect, enhance and increase Green Infrastructure in the District.	Will it protect the district's infrastructure?	Will it interfere with connectivity of habitats (consistent with Norfolk Econets project) (y=, n=0)
		Will it enhance the district's infrastructure?	Will it enhance connectivity of habitats (consistent with Norfolk Econets project) (y=+, n=-)
		Will it facilitate the creation of new Green Infrastructure which will improve links and corridors between open space?	Dependent on type and design of development, not location.
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	Will it maintain and enhance the distinctiveness of landscape and townscape character?	Is the site within a landscape that has moderate-high or high sensitivity to change as defined in the Breckland Settlement Fringe Landscape Assessment (y=, n=+)



SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
		Will it maintain and enhance the character of settlements?	Does it involve the re-use or re-development of derelict buildings? (y=+, n=-)
		Will it protect and enhance open spaces of amenity and recreational value?	Would it involve the loss of designated open space (y=-, n=+)
	10. Conserve and where appropriate enhance the historic environment.	Will it protect or enhance (designated) heritage assets?	Will it result in the direct loss or damage to a listed building/ conservation area or damage to the setting of a listed building/ conservation area?
		Will it protect or enhance the significance and setting of (designated) heritage assets?	Will it result in impact upon the setting of a listed building/conservation area? (y=-, n=+)
Population and human health	11. Improve the health and well being of the population.	Will it reduce early death rates?	Is the site within a AQMA/ within or adjacent to a Hazardous installation Consultation Area? (y=-, n=o)
		Will it increase life expectancy?	Is the site within 1200m of outdoor playing space or sports facilities (y=+, n=-) (NFRA standards) / Would it result in a loss of outdoor playing space or sports facilities? (y=-, n=o)
		Will it improve access to essential services such as health facilities?	Is the site within 30 minutes public transport time or walking time of a primary health care facility? (Norfolk LTP) (y=+, n=o)
		Will it encourage healthy lifestyles, including travel and food choices? Will it help the population to move more, eat well and live longer?	Summary of 5d, 5e, 11c

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
	16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?	Is it an allocation for housing ? (y=+, n=o)
		Will it reduce the number of unfit homes?	Will it involve the redevelopment of unfit homes?
		Will it reduce housing need?	Is the allocation proposal for housing? (y=+, n=o)
		Will it meet the needs of the travelling community?	Is the allocation for a gypsy and traveller site?
Economic Activity	17. Increase the vitality and viability of existing town centres.	Will it increase vitality of existing town centres?	Is it in the town centre? (y=+, n=-)
		Will it increase viability of existing town centres?	Is it in the town centre? (retail and leisure allocations only) (y=+, n=-)
		Will it provide for the needs of the local community?	What
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	Will it support and improve education?	Is the allocation for an educational establishment? (y=+, n=-)
		Will it encourage employment and reduce employment overall?	Is the allocation proposal for employment land ? (y=+, n=o)
		Will it improve access to employment?	Is the site within 800m or 30 minute public transport time of residential areas? (for residential and employment
		Will it improve access to employment by	Is the site within 800m or 30 minute public transport time of residential areas? (for residential and employment use allocations only) (y=+, n=-)

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	Decision making criteria
	19. Improve the efficiency, competitiveness and adaptability of the local economy.	means other than single occupancy car?	
		Will it improve business development and enhance competitiveness?	Is it in an area with a deficiency of employment land? (for employment use allocation proposals only) (y=+, n=o)
		Will it make land and property available for business development?	Is the allocation proposal for employment land ? (y=+, n=o)
		Will it support sustainable tourism?	Is the allocation proposal within a town or local service centre or accessible by public transport? (y=+, n=o)

## APPENDIX 3

### Responses from Statutory Consultees

**From:** Mugova, Elizabeth [mailto:[elizabeth.mugova@environment-agency.gov.uk](mailto:elizabeth.mugova@environment-agency.gov.uk)]

**Sent:** 15 April 2016 11:13

**To:** Wright, Josephine

**Subject:** RE: Screening Opinion Request - Croxton, Brettenham and Kilverston Neighbourhood Plan

Dear Jo

Thank you for your email seeking a screen opinion.

According to the submitted 'Summary and Structure of Draft Plan'; it is our view that a Strategic Environmental Assessment would not be required for the Joint Neighbourhood Plan.

Paragraph 46 of the NPPF Practice Guidance, states that a strategic environmental assessment may be required for a neighbourhood plan which allocates sites for development. In this case, the Plan is not proposing to allocate additional housing and employment sites.

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Regards

Elizabeth

**Elizabeth Mugova**

**Sustainable Places Planning Advisor**

**Cambridgeshire and Bedfordshire Area**

**Direct dial: 020 3025 5999**

**Internal: 55999**

**Email: [elizabeth.mugova@environment-agency.gov.uk](mailto:elizabeth.mugova@environment-agency.gov.uk)**



Historic England

Josephine Wright  
Neighbourhood Plan and Growth Officer  
Breckland Council  
Elizabeth House  
Walpole Loke  
Dereham  
NR19 1EE

Our ref: 2016 04 26  
Croxtan  
Brettenham &  
Kilverstone Joint  
NP Screening.

Telephone 01223 582775

By email only to: [Josephine.Wright@breckland.gov.uk](mailto:Josephine.Wright@breckland.gov.uk)

26<sup>th</sup> April 2016

Dear Ms Wright

**Strategic Environmental Assessment (SEA) Screening Opinion for the Croxtan, Brettenham and Kilverston Neighbourhood Plan.**

Thank you for email dated 31<sup>st</sup> March 2016 and submission of papers dated 20<sup>th</sup> March 2016 which set out the summary and structure of the draft plan and following an initial scoping workshop session on 11<sup>th</sup> February 2016.

For the purposes of this consultation, Historic England will confine our advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage. Our comments are based on the information supplied in the email attachments, including the details following the initial scoping workshop session as reported and held on 11<sup>th</sup> February 2016. It is for the Council to make the final decision in terms of whether SEA is required.

From our reading of the scoping workshop sessions it would appear that the joint Neighbourhood Plan focuses on shaping how development comes forward with particular reference to a 'policy focus'. These papers also confirm '*no allocations to be made for housing development*'.

The initial scoping workshop in setting out a vision stated that the Joint Neighbourhood Plan area '*includes the previously identified Sustainable Urban Extension (SUE), which is subject to the adopted Thetford Area Action Plan*'. We are aware that the Thetford Area Action Plan (AAP) Development Plan Document was adopted 2012 and was the subject of a sustainability appraisal. The AAP itself contains both policy objectives, policies and allocates land.

The details contained in the screening request deal predominantly with a policy focus and it appears the case that the Joint Neighbourhood Plan will not allocate land.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





If the Joint Neighbourhood Plan does not propose to allocate land or contains policies likely to have an impact on the historic environment then a SEA will not be required to evaluate the impact upon the historic environment. There is some doubt here regarding the point on almshouses as set out in the housing policies. It is unclear if this is a policy matter or is seeking to allocate land. Looking at the general direction of the papers we have assumed that this is a policy matter but if that is not the case then a sustainability appraisal may be required.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations, 'CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT' [Annex II of 'SEA' Directive], and the assessment duties in the Regulations Part 2 (5)(6), Historic England would take the view that an SEA is not required.

The views of other statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made. I would be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided in the file attachments to your email of 31<sup>st</sup> March 2016 (which contains the summary notes following the initial scoping workshop session dated 11<sup>th</sup> February (*Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan 2016 – summary and structure of draft plan following initial scoping workshop session 11<sup>th</sup> February 2016*)).

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise in the Neighbourhood Plan where we consider that, despite the absence of SA/SEA, these would have an adverse effect upon the historic environment.

We hope that the above comments are of assistance.

Yours sincerely



**Michael Stubbs**  
Historic Environment Planning Adviser  
e-mail: Michael.Stubbs@HistoricEngland.org.uk



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Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.



Date: 12 May 2016  
Our ref: 182430



Ms Josephine Wright  
Neighbourhood Plan & Growth Officer  
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CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Josephine

The Croxton, Brettenham and Kilverston Neighbourhood Development Plan – SEA Screening Opinion Request

Thank you for your consultation on the above dated 31 March 2016 requesting a screening opinion on the above.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England considers that a Strategic Environmental Assessment (SEA) is required. This is due to the fact that the three settlements are very close to several SSSIs associated with Breckland SPA and Breckland SAC, including Breckland Forest SSSI, Bridgham and Brettenham Heaths SSSI, East Wreatham Heath SSSI and Breckland Farmland SSSI. Although the plan will not include any further allocations due to the housing requirements being satisfied by the Thetford SUE, the plan will need to consider locations for additional school and care facilities throughout the parish following this development. As well as this there is likely to be development of new small housing developments and small business improvements and opportunities. Without being aware of the exact locations it is difficult to assess whether there may be any effects on designated sites due to these developments. A specific policy on density is also proposed for all settlements, as well as a review of the change in settlement boundary at Brettenham, so it is pertinent to consider the environmental implications of these policies. Therefore although there are no allocated sites within this neighbourhood plan, due to the proximity of the designated sites and lack of firm locations for we consider that an SEA is required.

I hope this letter has been helpful. For clarification of any points in this letter, please contact me on 0208 0265792 or for any further consultations on your plan, please contact:  
[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Francesca Shapland  
Lead Adviser, Planning & Conservation

## **Appendix G – JNP Progress Report September 2016**

### **Progress Report 2016**

#### **Brettenham & Kilverstone Parish Council**

#### **Croxton Parish Council**

#### **Purpose of Report**

The purpose of this report is to provide Croxton and Brettenham & Kilverstone Parish Councillors with an update on progress made in respect of the production of the Joint Neighbourhood Plan (JNP) between April and September 2016.

#### **Progress in 2016 – April to September 2016**

Strategic Environmental Assessment (SEA):

A Summary (Scoping) Document which outlined the potential areas for policy development was submitted to Breckland Council on 25<sup>th</sup> March 2016 for onward transmission by Breckland Council to the statutory Environmental bodies - Historic England, Environment Agency, and Natural England – in order to gain their views on whether a formal Strategic Environmental Assessment (SEA) will be required.

This is a formal process and can take up to 6 weeks. At the time of the production of the first Progress Report on 30<sup>th</sup> April 2016, the Parish Councils were only aware of the views of one of the statutory agencies - the Environment Agency had responded and confirmed they do not consider SEA is be required.

Heritage England responded to Breckland Council on 26<sup>th</sup> April and came to a similar conclusion.

Natural England responded to Breckland Council on 12<sup>th</sup> May 2016, however they raised some concerns about the potential impact of new development on designated sites and concluded that SEA would be required.

Unfortunately, due to a change in personnel and Breckland Council, the Parish Councils were not made aware of the Natural England response and it was only when the formal opinion of Breckland Council that SEA would be required was received by the Parishes on 22<sup>nd</sup> July 2016 that this came to light.

Further clarification was sought from Breckland Council and it has been concluded that there has been some misunderstanding of the remit and intention of the JNP by Natural England and that they have erroneously concluded that the plan is promoting further new development (above and beyond that already allocated in the SUE)

Advice therefore from Breckland Council has been that rather than produce a new scoping document and apply for a further Screening Opinion that the Parish Councils press on with

production of a draft plan policies for consultation and that these policies provide the clarity of direction that will enable Natural England to revise their conclusions.

#### Draft Plan Production:

Whilst the delay in the receipt of a formal SEA Screening determination from Breckland Council has led to a delay in the original proposed timetable Progress has been made on firming up the policy areas to be covered in the JNP

These are:

1	Housing Design, Materials etc	Generic Policy
2	Housing Density	Generic Policy
3	Local Landscape character/gateways	Generic Policy (will be informed by Character Appraisal Work)
4	Influencing the detailed design of the SUE	Generic Policy (will be informed by Character Appraisal work)
5	Historic Environment/ Character	Generic Policy (will be informed by Character Appraisal Work)
6	Transport	Generic
7	Community Facilities in the SUE	Generic
8	Employment	Generic
9	Preservation of Landscape (Strategic gap) between Croxtan Village and A11	Croxtan (will be informed by Character Appraisal Work)
10	Conservation Area/Character policy	Croxtan (will be informed by Conservation Area Appraisal Work)
11	Areas for Enhancement	Croxtan (will be informed by Character Appraisal Work)
12	Alms Houses	Brettenham& Kilverstone
13	Conservation Area style policy/character  Maintaining the distinctiveness of the three separate settlements Rushford, Brettenham and Kilverstone	Brettenham& Kilverstone (will be informed by Character Appraisal Work)

14	Areas for enhancement	Brettenham& Kilverstone (will be informed by Conservation Area Appraisal Work)
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Work has also been progressing on drafts of the preliminary chapters:

Introduction, Living in..., Vision and Monitoring and Implementation

**Character Appraisal Work:**

The Parishes have agreed on a character appraisal style approach to underpin their emerging policies. This approach has been endorsed by Breckland Council.

Survey Work has undertaken by both parishes on a systematic basis to appraise the local character of their area and to capture what they consider to be its cultural, historic, environmental and community value.

The results of the character survey work will then be pulled together into one document that will help to inform the development of relevant policies.

Both the character appraisal and the draft policies will be the subject of future public consultation

**Timetable:**

The next steps are currently programmed as follows:

Mid-September - Draft Policies and Character Appraisal Work to be finished

Parish Councils will consider draft policies at their September meetings

End of September - 1<sup>st</sup> Draft character appraisal to be completed by end of September

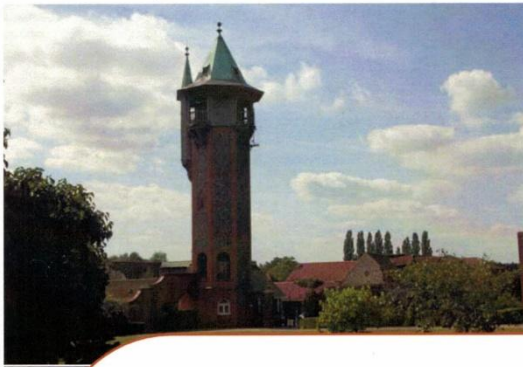
Early-mid October - informal Public consultation event to be held in early to mid-October 2016, where comments on both the character appraisal and the draft policies will be invited.

November/December - Formal Public Consultation (6 weeks)

Andrea Long MRTPI – September 2016

**Appendix H – Consultation Flyer (Informal Consultation)**





**Saturday 29th**  
**October – Croxton**  
**Village Hall**  
**10 am – 1.00 pm**

### **Croxton, Brettenham & Kilverstone Joint Neighbourhood Plan**

The preliminary Draft JNP document which includes Draft Policies and Character Appraisals has now been developed. The next step is to have an informal drop-in meeting where you can view and discuss this with Councillors and other residents.

This will be followed by an informal consultation period from October 29 – November 30, to allow written comments to be forwarded to each Parish Council by email at:

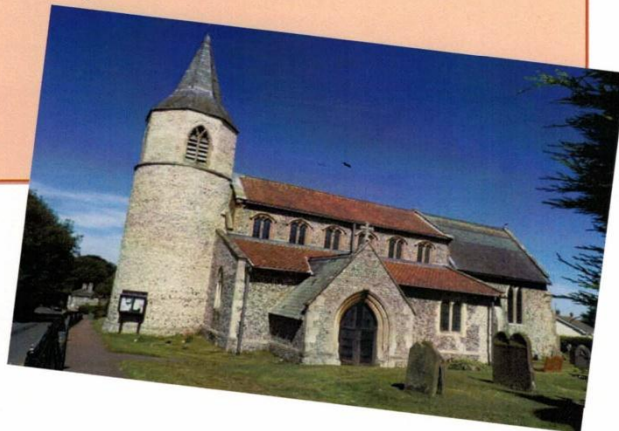
[croxtonparish@gmail.com](mailto:croxtonparish@gmail.com)  
[clerk@brettenhamandkilverstonepc.co.uk](mailto:clerk@brettenhamandkilverstonepc.co.uk)

The preliminary draft JNP will also be posted on the following websites:

[www.croxtonpc.norfolkparishes.gov.uk/](http://www.croxtonpc.norfolkparishes.gov.uk/)  
[www.brettenham-and-kilverstonepc.norfolkparishes.gov.uk/](http://www.brettenham-and-kilverstonepc.norfolkparishes.gov.uk/)  
[www.c-bandkjointplan.norfolkparishes.gov.uk](http://www.c-bandkjointplan.norfolkparishes.gov.uk)

A final Draft Plan will then be developed, including any environmental assessments required, and submitted for Formal Consultation early in 2017

We hope to see you on Saturday 29th!



**Appendix I – Response Table Informal Consultation October -November 2016 – Character Appraisal**

**Responses to Consultation on Character Appraisal**

Page Number	Respondent	Comment	Suggested Response	Suggested Action
General	1	Missing Buildings photographs and descriptions	Noted. These will be incorporated	Amend Appraisal document accordingly
General	10	Who at Norfolk highways has only one brain cell and gets given the job of planning the road closure in Rushford and the Diversions? The road is closed, at the top of the Thetford road at the 1066 there is a road closed sign. But no sign at the top of Crabapple lane. So, all day we have had cars vans and lorries and tractors coming down Crabapple lane to see a diversion sign sending them back to the 1066, and guess what destroying the verges and the grass triangle.	The Rushford section of the CA will be recast to include more photos and have its own sub section	Consideration is being given to re-ordering the Character Appraisal Work by Character Area  Appraisal to be amended accordingly

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		<p>It's about time the PC made some noise about the small things that affect people's lives," my life"! It would be a good idea if PC members read the guide on the website on how to be a good parish councillor! It might open a few eyes.</p> <p>I have also read the booklets handed out at the drop-in centre in Croxton regarding the Neighbourhood plans. Rushford has two pages! Just two? to make it worst the text is hardly representative of Rushford, I am sure the Sheik could have written a better description of Rushford. It's absolute rubbish.</p> <p>I hope the revised version considers of what the villages had to say about our village when we got involved and asked all our neighbours</p>		
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		to make a statement about Rushford, also it incorporates some of the photographs taken around the village.		
Page 20	11	<p>Just gone through the character Appraisal, overall its very good although there is one aspect that I'm not sure about concerning the vicarage.</p> <p>Under areas for improvements the paragraph states that building would be considered to assist in costs towards improvements to the property. This to me gives way to having development within the area of the vicarage under the guise of assisting in costs for improvements. Not sure</p>	<p>It should be noted that the site lies outside of the current settlement boundary for Croxton and also that the proposal from Breckland is to remove the settlement boundary in its entirety; therefore, realistically the prospects of development being acceptable in this location are very low and the JNP policy will need to be recast to reflect this.</p>	<p>Policy to be recast to remove reference to development at the Vicarage</p>

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		that this should be stated at all?		
Page 8	8	Harling Drove was so called because it was used by drovers to take their sheep to the East Harling Sheep Sales – boys from the village were paid a penny to watch the sheep while the shepherds came into the village to have a drink at the local!	Comments noted. And could usefully be incorporated into appraisal	Amend appraisal accordingly.
Page 8	8	Bronze Age Flints have also been found on the Hadlers Hole field behind Melville and Harefield Roads	Comments noted and appraisal to be amended to pick this information up	Amend appraisal accordingly
Page 14	6	Primitive Methodist Chapel under a slate(?) roof..... err look at the photograph	Agreed.	Amend description accordingly.

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Page 15	6	Can hardly be described as a village shop. It is a minor rural Post Office which I imagine is likely to close in the not too distant future in the face of local competition.	Comments noted.	No change
Page 18	6	"Thatched flint cottage" part flint mainly rendered and painted white	Agreed	Amend document accordingly
Page 19	8	Should read Fibrowatt	Fibrowatt is the name of the company, who refer to it as "Fibrothet" to distinguish it from their other operations	No change
Page 20	6	Large Copper Beech tree at Hall Farm listed as one of BDC amenity assets	Comments noted. It is not clear if this is being referred to as a TPO?	Check with BDC for TPOs
Page 21	6	Accuracy of description "Quiet rural village"???	Is an individual subjective view	Consider changing to " <b>relatively</b> quiet rural village"
page 8	4	Character Assessment for	Character Appraisals were	Consideration is being given

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		<p>Rushford recognised as inadequate and fails to identify enhancements see Planning Aid for ref.</p>	<p>carried out for each parish. The Rushford Character appraisal survey work used a different template to the others and did not identify any enhancements.</p> <p>The 30-day informal consultation itself presented a further opportunity for information relating to the Character Appraisals to be provided however this was not taken up by the local team.</p> <p>It is proposed to re-order the Character Appraisal for the formal consultation and recast it with each parish/or part parish having its own section rather than the thematic delineation that has currently been used which may help to address</p>	<p>to re-ordering the Character Appraisal Work by Character Area</p>
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			<p>this specific issue.</p> <p>However, the JNP policies and the Character Appraisals will undergo further amendments and there will be further opportunities to comment on the wording during the next formal stage of consultation in Spring 2017.</p>	
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**Appendix J – Response Table Informal Consultation October – November 2016– JNP Policies****Responses to JNP Informal Consultation - JNP Policies**

Page Number/Policy Number	Respondent	Comment	Suggested Response	Suggested Action
General	1	Pages 13 & 14, missing	Agreed. Due to printing error	Website Documents were correct
General	1	Pages 39 & 40 missing  Strategic Gaps	Agreed. Due to printing error	Website Documents were correct
General	2	A very well laid out and professional display – thank you.  Sadly, Heathlands Drive is going to be affected by the noise and disruption, a bit of a bleak future.	Comments noted.  Assume comment is related to the timing of construction of the proposed development which already has the benefit of planning permission. The principle of development here has been established and is therefore outside of the scope of the	No change to Plan

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			JNP to influence.	
General	3	<p>This now becomes a community on its own. Neither part of Thetford or Croxton – is that a good idea? Like Cloverfields / Abbey Farm etc. etc. history repeating itself.</p> <p>SSSI - Forestry should not be classed as SSSI. It should be classed as managed conservation like farm land!</p> <p>Has the Stone Curlew been found in the Forestry which is not its natural habitat?</p>	<p>The principle of development has been established through the development of the Breckland Core Strategy, the Thetford Area Action Plan and through the grant of planning permission 3PL/ 2011/0805/O. A key objective of the JNP is to integrate the new development with the existing settlements. Sites of Special Scientific Interest (SSSI) are designated at a national level by Natural England using defined criteria relating to species and habitats and the mechanism to amend or change these lies outside of the JNP remit.</p> <p>See link to Breckland Council's most recent HRA for more information on Stone Curlews: <a href="#">here</a></p> <p>Comment noted</p> <p>Query noted</p>	No change to Plan

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General	4	Thetford Town Council would be better placed to provide the above, it is an extension of Thetford	<p>This is an expression of personal opinion which seems to be at odds with previous views expressed by the respondent in respect of local involvement and accountability.</p> <p>It is a matter of fact that the SUE falls within the parishes of Croxton, Brettenham and Kilverstone and therefore Thetford Town Council has no mandate or jurisdiction.</p> <p>Rushford is a very small but important part of Brettenham Parish which the PC wishes to preserve. The PC also wishes to integrate the SUE and its residents into the existing communities of Brettenham and Kilverstone everyone can benefit from the enlarged community and new facilities.</p>	No change to Plan
General	4	In conclusion, build the SUE and TEP and leave the rest of the Parish alone, as a strategic gap, as we have given up enough	Comments noted	No change to Plan
General	4	<p>As the deadline for comments fast approaches, I feel I must put down my thoughts. I have read the draft Plan and the Character Assessments and would like to formally comment.</p> <p>If the Neighbourhood Plan is based on the assessments, then the assessments have to be right. As</p>	The Character Appraisals (excepting Rushford) followed a structured and consistent survey methodology based on a nationally recognised template. They were undertaken by local people. They will be refined as a consequence of comments received during the informal consultation process and also during the formal consultation in Spring 2017.	Consideration is being given to re-ordering the Character Appraisal Work by Character Area



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		<p>you know, I and others have helped my husband, with the one for Rushford, and am really disappointed to discover most of what we wanted has been disregarded, watered down and the remainder, randomly placed amongst Croxton, Kilverstone and Brettenham - and you made us rush it, and it was incomplete- why hasn't Rushford got its own section? I feel, quite frankly, that the PC has been unhelpful, unresponsive and failed to recognise the importance of getting it right. The Plan itself keeps harking on about the "SUE" fitting in, but there's little to fit in with - from what I understand, it is going to be a whole new town and a part of Thetford and I believe therefore, Thetford Town Council would be far better placed to take it on board and look after it all, leaving the PC to concentrate on what it's supposed too. Please just leave Rushford alone - put a 30mph limit from the B1066 and a width restriction on the bridge like you have been asked before, and get rid</p>	<p>Some further work may be required in terms of the Rushford appraisal to make it more easily comparable to the others.</p> <p>The respondent may have misunderstood the process and assumed that these are the final documents which clearly, they are not – they are consultation drafts</p> <p>None of the Rushford character appraisal work was used for Croxton or Kilverstone.</p> <p>It is proposed to re-order the Character Appraisal for the formal consultation and recast it with each parish/or part parish having its own section rather than the thematic delineation that has currently been used which may help to address this specific issue.</p> <p>The remainder of comments appear to be expressions of opinion in respect of the principles of the SUE development rather than matters that fall within the remit of the JNP policies</p>	
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		<p>of those unsightly plastic bollards and do not put flashing signs in our village, which, as you already know, I do not want. I believe by submitting this Plan, the PC receives CIL money and I wonder just what they intend to use this money for in the future? It would be nice if you spoke to us - to me, it seems the PC will do just as they want as all they're after is the money and the power and using our name to get what you want whether I like it or not - it seems the more that is kept from us, the more you get what you want. I've been to the meetings and filled out the questionnaire and I don't get it - how can a little Parish Council think it can cope with a whole new town when it cannot encourage its own residents - it would be nice if you would speak to us.</p>		
Preface- page 5	4	<p>One disappointing public meeting over 2 years ago</p> <p>One questionnaire 24% returned 18</p>	<p>It's true the initial meeting attendance was disappointing, but enthusiasm has now grown with 60 attending the informal consultation launch. The questionnaire return was lower</p>	No change to Plan

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		<p>months ago</p> <p>No newsletters</p> <p>No Steering Group see Rack heaths for ref.</p> <p>No Working " " Mattishall's " "</p>	<p>than had been hoped but the PC considers represented a reasonable response and is statistically sound when using national benchmarks. The Joint PCs are the SG and the 2 chairs and vice chairs, and consultant are the WG.</p> <p>The % figures quoted are not correct. This section of the plan sets out the process to date – it is not the entire process and further stages are required.</p> <p>Croxton Parish Council produces bi-monthly newsletter with updates for residents.</p> <p>Both Parish Councils have their own websites and there is also a Neighbourhood Plan website that is regularly updated.</p> <p>There are also no size fits all process for the production of JNPs and it is down to the body producing the Plan to determine the process to be followed provided it meets the statutory tests.</p> <p>National guidance encourages plans to be as short as reasonably practicable and there is no defined page or word limit.</p>	
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Section 1- page7	4	Community not involved see Locality. com for ref. Engagement req. to identify "anyone else" Document short as there is no content	See comments above	No change to Plan
page 8	4	Character Assessment for Rushford recognised as inadequate and fails to identify enhancements see Planning Aid for ref.	<p>Character Appraisals were carried out for each parish. The Rushford Character appraisal survey work used a different template to the others and did not identify any enhancements.</p> <p>The 30-day informal consultation itself presented a further opportunity for information relating to the Character Appraisals to be provided however this was not taken up by the local team.</p> <p>It is proposed to re-order the Character Appraisal for the formal consultation and recast it with each parish/or part parish having its own section. rather than the thematic delineation that has currently been used which may help to address this specific issue.</p>	Consideration is being given to re- ordering the Character Appraisal Work by Character Area
page 11 Fig 3-	4	Is Rushford in an SSSI? the residents believe it is	Fig 3 is provided by Breckland Council and shows the delineation of the nature conservation designations. The base	No change to Plan

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		Where are pages 13 & 14	<p>data is provided to Breckland Council by Natural England who is the designating authority for Sites of Special Scientific Interest (SSSI). Therefore, if parts of Rushford are not shown as falling within a SSSI then they do not fall within the SSSI and vice versa.</p> <p>See comment above in respect of missing pages</p>	See above
Page 15	6	<p>If, under the Localism Act 2011, power is given to the communities and the community is happy with the settlement boundary, cannot the local community reject any Breckland imposed removal?</p> <p>PD05B - Is all very well and good but the planners will simply overturn what is contained in this. They did it with the Bennett homes. I do not know if a PD05B or its equivalent</p>	<p>The Preferred Site options and Settlement Boundaries consultation undertaken by Breckland Council in October 2016 includes a proposal to remove the current Settlement Boundary for Croxton. The delineation of settlement boundaries is a function of the Breckland Local Plan and not the Joint Neighbourhood Plan. The JNP will need to work within the policy framework set by the Local Plan and must be in conformity with it. The comments are best directed to Breckland Council in relation to the development of their emerging Local Plan.</p> <p>PD05B is not a term used in the JNP policies and the respondent has probably clicked on the link on page 15 which goes straight to the Breckland Local Plan consultation. The</p>	No change to Plan

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		<p>was in place when planning was granted for these homes, but they cross the boundaries for the proposed new rules.</p> <p>The highway aspect at the top of the hill which squeezes all traffic as it comes over the brow is something that should be addressed. Quite how you widen the road whilst providing footpaths unless a tall retaining wall is built is beyond me. At least the vehicles will be going faster when they hit the cars coming out of the Bennetts estate.....</p>	<p>comments made here are therefore more relevant to that consultation.</p>	
Living in... page 17	4	<p>How many people reside in Brettenham Village "" ""Shadwell " "</p> <p>" " are dispersed around the Parish not in settlements</p> <p>195 residents reside on Arlington, in an urban environment, outweighing the rest of the residents in the rural environment</p>	<p>Comments noted although it is unclear what point is being made here is and how it relates to the proposed JNP policies.</p> <p>However, it is a statement of fact to say that Brettenham Parish is made up of several distinct areas of built settlement – Brettenham village, Rushford, Shadwell and Arlington Way. Arlington Way contains the most built up area and therefore unsurprisingly the most residents.</p> <p>Arlington Way is not an “urban environment” although it is a recent development with no specific shops or facilities. It is a</p>	No change to Plan

			cul de sac and does not change the overarching rural nature of Brettenham Parish	
Page 18	7	<p>If this is Breckland's standard of research into local employment, enterprise and business (and grammar and spelling!) - it is not too impressive! V odd that they state, 'there is little identifiable industry or commerce within Croxton' when the nursery is so visible. Salix is such a great success and innovative story. Not to mention Goucher and Raker fields growing 4000 tonnes of spuds!</p> <p>Salix River and Wetland's head office and main nursery is based at Croxton Park and employs up to 20 people from the surrounding area and grows over 500,000 plants each year for river erosion control installation nationwide with major contracts with the Environment Agency, Natural England and river authorities. This is complimented by a separate Wild Flower Production company. Two farming companies are also based at Croxton Park, farming in Croxton itself and</p>	The information on businesses in Croxton came from several sources including Breckland Council, the Parish Council and the census. However, the information on Salix is extremely useful contextual information and the "Working in Croxton" section of the revised plan will be amended accordingly	Amend wording of "Working in Croxton" to include proposed text. (page 18)

		surrounding villages and are the second largest employer in the village with 10 employees living locally. Vegetable production from Croxton (Hall Farm and Croxton Park) supplies the main 4 supermarkets and major processors. Additional staff are taken on from the locality during the harvest seasons (May to November)		
page 18	8	The Crown Estate are a major landowner and their land is now farmed as one holding with a single tenant	Agreed. The current sentence is incomplete and requires amending.	Amend “Working in Croxton” section to include the word “tenant”
Page 18	6	<u>Working in Croxton</u> – Gerald's Farm -Thousands of tonnes of produce come from Gerald's Farm in the middle of the village. Sheep and cattle are reared there. Large numbers of workers are used in various harvests which go on throughout the year. Croxton Park Ltd produces 4k tonnes of potatoes alone and many other crops as well. Incidentally I think Salix are based on the edge of	Comments noted. Changes are proposed to this section as a result of other representations received. See above.	See above



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		<p>Croxton Park and not in Wales.</p> <p>STANTA - Myself and two others in the village were working there until we retired. I have no doubt that others from the village will work there. Sheep have to be cared for on the 30k acres of the battle area and many crops are grown around the edges of the site. It is an important contributor to the economy of the area and not just be dismissed as MOD STANTA. The village is also an important access route to STANTA - men and vehicles have to get there somehow. They are not all dropped in by parachute. Large numbers of troops need several access routes.</p>	<p>Comments noted. Consideration will be given to amending the text to best reflect the impact of STANTA.</p>	<p>Amend text to refer to wider impacts of STANTA</p>
Working...page 18	4	<p>Tesco and Thetford Garden Centre unsurprisingly LARGE number of Estate and Farming properties</p>	<p>Agreed. Amend section to make specific reference here to the garden centre Tesco's lies outside of the JNP area.</p>	<p>Amend Plan accordingly</p>
Page 19	6	<p>Some heavy vehicles will always have to come through the village be they army vehicles or artic carting sugar beet to Bury St Edmunds. It is easy enough to stop the "rat-runners" trying to avoid the</p>	<p>The purpose of this section is to identify what it is like living in Croxton today and what the specific issues are that have been identified as being of concern. The issue of traffic has been identified through the questionnaire and by the Parish</p>	<p>No change to Plan</p>

		<p>roundabout. Put up some "Access Only" signs with a weight limit attached on the feeder roads from the A134.</p> <p>Speeding through the village. It is unnerving, but one must ask for the statistics. How many crashes have there been? Has anyone been injured? Has anyone been killed? Are the new people in the village, who follow you from the brow of the hill and down into Harefield road with their speed guns, just furious because they failed to recognise these problems when they bought their houses? The solution is obvious.</p> <p>Potential bus service takes up from Croxton? Probably small.</p>	<p>Council.</p> <p>The solutions to any perceived problems will require action by Norfolk County Council as Highway Authority and they will require specific evidence before they implement any solutions.</p>	
Physical...page 20	4	List all of Rushford's listed buildings	It is proposed to remove reference to the Listed buildings in Croxton from this section and to incorporate it within the relevant section of the Character appraisal. It will be replaced by a general statement about the quality of the built	Remove reference to the specific Listed Buildings and move to

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			environment and this will be replicated for the Brettenham & Kilverstone Sections. Therefore, there will be no need to specifically identify Listed buildings for Rushford in this section	relevant Character Appraisal section. Replace with general statement about quality of built environment
page 21	4	Character Assessments have to be right, they are a Key Aspect of all NP Policies and influence the Plan	Comments noted.  The Character Appraisals will also be revised in the light of comments received during the informal consultation.	No change to Plan
Section 3- Vision page 22	4	Your vision is flawed, it will be different, it is a new town with roads, shops, pubs, cafes, street lighting, mains services, pavements, etc., it will look similar to Arlington, which is at loggerheads with the vernacular. What is wrong with contemporary, my Daughter who is 17 does not like mock architecture.  Phase 1 is adjacent to Admirals and is quite modern and popular	The vision refers to the whole of the JNP Plan area – not just the SUE. Its specific intention is to integrate the residents of the SUE into our communities, so everyone benefits from the facilities of the SUE and gels into one community with a generally rural character	No change to Plan

Page 23	6	<p>The gateways to the villages must be safe. Feeding increasing amounts of housing estate traffic onto The Street in Croxtan where traffic speed over the hill will inevitably lead to an accident.</p> <p>Speed cameras or not people will speed into the village. It is their nature. If the vicarage site is to be developed, and Bennetts obviously think that it is, there is going to have to be some imaginative thinking about how the traffic is going to be fed onto The Street; through the Bennett's estate? Well south of the current 30mph sign? Through Douglas Close following the purchase and demolition of one of the bungalows?</p> <p><u>Community Facilities</u></p> <p>As people get older and wear out they become obsessed with their health, with golf or with both. We are all going to need increasing levels of maintenance the older we get. This is something we must accept, and we must accept that if we are not too fit we will <u>not</u> be able</p>	<p>The purpose of this part of the vision is to ensure that the entrances to the villages retain their rural character.</p> <p>However, it should be noted that the site lies outside of the current settlement boundary for Croxtan and also that the proposal from Breckland is to remove the settlement boundary in its entirety; therefore, realistically the prospects of development being acceptable in this location are very low and the JNP policy will need to be recast to reflect this.</p> <p>Comments noted. The Section 106 relating to 3PL/ 2011/0805/O refers to Primary care provision which is still to be determined and will be influenced by the requirements of the Primary Care trusts/CCGs and as part of a discussion between Breckland (as LPA) and the developer.</p>	<p>No change to Plan</p> <p>Policy to be recast to remove reference to development at the Vicarage</p>
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		<p>to walk or cycle to the Primary Care Centre. Don't let it even cross your mind that your GP will come and see you in your home on a regular basis. The Primary Care Centre will have to be large, have comprehensive facilities, have excellent communications and have lots and lots of parking.</p> <p>If you want, try and estimate scale and size think of the Academy and how many children it serves and then think of how many people need health care and image a building of the appropriate size.</p> <p><u>Transport and Highways Safety</u> Cycling to Gt Hock ham might be fine on a summer's day but is it a priority on a cold day in February? Could the money be better spent?</p>	<p>In recent years cycling has become a popular recreational activity particularly with families. Increasing opportunities for safe cycling has a number of health and well-being benefits as well as introducing people to their surrounding countryside. It is recognised that it may be seasonal however any form of modal shift will only be achieved through positive action making opportunities available.</p>	
page 23	4	<p>I have little idea of what the existing environment is like in the SUE as it is on private land. The Character Assessments must identify what is important to the residents,</p>	<p>The area to be developed as the SUE is currently undeveloped agricultural land. The remainder of this representation appears to be a statement in relation to the Character Appraisal.</p>	No change to Plan

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		<p>for me, especially along the Little Ouse valley.</p> <p>Facilities are already included in the SUE as you know. There are no pedestrian or cycle links to or from Rushford or public transport</p>	<p>The SUE already has the benefit of planning permission in outline and therefor the principles of development are excluded for the remit of the JNP although it will allow the community to benefit from it and for the JNP to influence the construction where appropriate</p>	
page 24	4	<p>Kingsfleet must be a £1,000,000,000 project</p>	<p>Comments noted.</p> <p>The SUE will provide the facilities needed by the 3 Parishes and 2 PCs The costs involved in the development are more likely to be in millions rather than billions.</p>	No change to Plan
Section 4- Draft Policies page 25	4	<p>Character Assessments underpin and inform most policies and are fundamental to the NP they must be right</p>	<p>Agreed. The Character Assessments are important which is why 5 separate local teams were established to determine the local character. There will be 2 public consultations to ensure this is so.</p>	No change to Plan
JNP1- page 27	4	<p>Arlington does not conform to the vernacular and nearly half of Rushford and Brettenham are new. Good design is what's needed, not pseudo detailing</p> <p>Rushford has been evolving for the</p>	<p>Comments are made in respect to existing development already built and occupied and therefore outside of the scope of this plan to influence that development. However, good design is important. The policies in the JNP are aimed at producing good design and good design is that which reflects its position in the locality and respects the size, scale, massing, materials and rhythm of its surroundings – this can</p>	No change to Plan

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page 28		<p>last 40 years to its present state</p> <p>How unwelcoming your comments for the new residents in Croxton</p> <p>To afford a house nowadays most couples have to work, and will go through various stages in life</p> <p>At present your evidence is flimsy and nothing like any other NP I've seen</p>	<p>be achieved through subtle details.</p> <p>The concerns indicated in this section came directly from resident's views through the questionnaire and refer to their concerns over future developments</p> <p>The remainder of this representation is a statement of "personal" opinion</p>	
<p>Page 27 - JNP1</p> <p>Page 28</p>	6	<p>Most of this comes out of The University of the Bl**dy Obvious. I would agree with every single bullet point other than the first. Back gardens should be larger than that.</p> <p>In my personal opinion the Bennett Homes that loom over the entrance to the village have not fitted in too well from the appearance of village. I have some concerns that the access from Bennetts' Homes on to The Street an accident waiting to</p>	<p>Comments noted.</p> <p>These comments refer to a development that already has been constructed and is therefore out with the scope of the JNP policies.</p>	No change to Plan

		<p>happen.</p> <p>The positioning of houses and garages has already led to pavement parking and partial obstruction of the entrance road. Cynically Bennetts appear to have left a strip of land so that should the vicarage be demolished they will have access to that land.</p> <p>No doubt they will argue that as planning has already been given for access onto The Street a couple of dozen more cars will not make much more of a difference.</p> <p>They will not be there of course to assist the Paramedics.</p> <p>The question of drainage in "The Street" has to be addressed ambitiously with overcapacity to cope with future village development.</p> <p><u>Commuter /Dormitory situation</u></p> <p>The village has to increase the number of young and middle-aged people. They have no work here so by definition will have to commute</p>	<p>See response to comments above in relation the Vicarage.</p> <p>This has been identified as an issue by the community and requires addressing although this will need to be through negotiation with the statutory undertakers and not just through the JNP process</p> <p>Comments noted. It is not clear how the respondent expects the village to attract more middle aged or younger residents</p>	
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		<p>to and from where there is work. They and their children will enliven and reinvigorate a community which unless things change will end up at "Croxtton Stay Active" each week before making an appointment with Mark Skinner. Encourage and embrace them.</p> <p>The Vicarage is poorly positioned on its plot and not a particularly attractive building. That plot and the land to the south and east of it would make an ideal block of land for further housing for prospective commuters if villagers were prepared to agree to an incremental urbanisation towards Thetford. I personally believe that it would encroach on the strategic gap and be the thin end of the wedge.</p>	<p>without an increase in appropriate residential provision.</p> <p>Comments noted although this statement appears to be contrary to previous comment on the Vicarage made by the same respondent.</p> <p>The JNP policies and character appraisal identify the Vicarage as a building of some merit albeit in poor repair and seek to secure its retention</p>	
Page 29 Policy JNP2 - Density	6	<p><u>Vision</u> Where on earth did anyone get the idea that Croxtton had a "tranquil character"; hooting of the trains, F15 Fighter jets, 81mm mortars - often just</p>	<p>Whilst it is appreciated that "tranquillity" is a subjective term it is a term identified by the Parish Council as being an appropriate description of Croxtton.</p>	No Change to Plan

		<p>before first light - single rotor and twin rotor Chinook and Osprey helicopters up until midnight.</p> <p><u>Housing Density</u></p> <p>Any attempt to introduce housing on the "John Prescott" density such as has been done in Stanford Road where the old ordnance field depot stood on Croxton Road should be fiercely resisted even if an attempt to justify it on the grounds of affordable housing was put forward. The attempt to do this on the "Cotters" site where two houses were applied for and then the application was suddenly changed to four is an example of too high a density.</p> <p>High density housing can lead to neighbourly friction and whether we like it or not each house will have a couple of cars if not more. They then park on the road and/or on the pavement - e.g. the slip road onto the Bennett estate in Croxton - obstructing service vehicles such as rubbish lorries and ambulances.</p>	<p>The aim of this density policy is in fact the reverse of the national prescriptive minimum density policy that was advocated by the previous Planning Policy Statement 3 – Housing.</p> <p>During the evolution of this policy, which initially looked at a minimum or maximum density it became clear that this would be difficult to define and also to justify and that it would fail to recognise differences in historical density patterns. This plan has sought to use a character led approach and therefore the policy wording has been phrased in such a way to allow for variation in density provided they are appropriate to the locality.</p> <p>However, it should also be recognised that the indicative details contained in the permission granted under 3PL/ 2011/0805/O will have set some overall density for the SUE.</p>	
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JNP2- page 29	4	The Arlington Estate is not integrated, it is all but gated, is a cul-de-sac and does not share the same concerns as the rest of the Parish Integration will be between the SUE and Thetford, we have nothing to share in Rushford	Comments noted. This appears to be a statement of personal opinion.	No change to Plan
JNP3- page 30  page 31	4	The Character Assessments must identify, we have much to protect in Rushford. Enhancements must be discussed fully with residents  Ditto	Character Appraisals were carried out by local people, for each parish. The Rushford Character appraisal survey work used a different template to the others and did not readily identify any specific enhancements. Therefore, it was difficult for residents to comment upon that aspect during this informal consultation which is disappointing.  However, the JNP policies and the Character Appraisals will undergo further amendments and there will be further opportunities to comment on the wording during the next formal stage of consultation in Spring 2017.  It is proposed to re-order the Character Appraisal for the formal consultation and recast it with each parish/or part parish having its own section rather than the thematic	Consideration is being given to re-ordering the Character Appraisal Work by Character Area

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			delineation that has currently been used which may help to address this specific issue.	
JNP4 page 32	4	<p>Character Assessments vital for Rushford</p> <p>SUE stands for sustainable urban extension it is an extension of Thetford</p> <p>There is no affordable housing on Arlington</p> <p>Engagement should start now, Pidgeon could have more on its web-site</p>	<p>See comments above in relation to Character Appraisal for Rushford.</p> <p>The remainder of this response is a statement of personal opinion, fact or matters that are not within the remit of this JNP</p>	No change to Plan
Page 32 - JNP 4	6	Mixed integrated housing might be an ideal but when are the brown rice and sandals social engineers going to realise that someone who has a crippling mortgage on a five-	Comments noted however the personal characteristics and behaviours of potential future occupiers of the SUE is not a matter for the JNP	No change to Plan

		<p>bedroom house does not want to have a row of one-bedroom flatlets on the opposite side of the road. Clustering similar housing and social groups together with graduated integration with other groupings rather than planting an apple tree in the middle of a Leylandii hedge works. It is not PC to express these views, but they arise from contacts with stressed patients who were at their wits end because of difficulties with incompatible neighbours. Integration and cohesion can occur, but it cannot occur abruptly where differences, for whatever reason, are divisively large. It has to be very sensitively done.</p>		
page 33	4	<p>The SUE is urban sprawl, no communities are lost, Kilverstone Estate are owners of the land being developed, and concrete jungle is applicable to inner city developments</p>	Comments noted	No change to Plan
JNP5 page	4	<p>The Character Assessments are inadequate to underpin and justify</p>	<p>The Character Appraisals (excepting Rushford) followed a structured and consistent survey methodology based on a</p>	Further refinement of Character

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34		this Policy and your statements	nationally recognised template. They were undertaken by local people. They will be refined as a consequence of comments received during the informal consultation process and also during the formal consultation in Spring 2017.	Appraisal will be undertaken
Page35	8	The village is already part of the cycle link between Croxton and Thetford under the TAAP (route 30 plus part of route 13)	Agreed. Although there may be opportunities to enhance this route	No change to Plan
Page 35 - JNP 6.	6	Let's be sensible about it and have paths and cycle ways which are commensurate with the needs in the community and which the community can afford. I am of average fitness for my age, but I probably walk for no more than an hour and a half if I wander off into the forest. "Proposals that include measures to enable improved levels of walking and cycling by residents etc " but will the majority of retired residents who do not already walk and cycle, perhaps because that have a bit of arthritis, asthma or whatever come out in their droves	Comments noted. See earlier comments in the vision section in relation to cycling which addressed this point. It should be noted that increasing the opportunities for walking and cycling is a key objective of national planning policy guidance.	No change to Plan

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		<p>to hit a two-hour target because the planning gauleiter says it is good for them?</p> <p>Back to the "rat-run" - solar powered mph displays and "Access Only" signs. If you can't stand the residual essential traffic that remains - Move!</p> <p>If you don't like the traffic going to Tesco - Starve!</p>	<p>Comments appear to be a statement of personal opinion.</p> <p>See above.</p>	
JNP6 page 35	4	<p>I would like more information on footpaths and cycle networks</p> <p>I do not like the term "rat run" for people going about their daily business</p> <p>Rushford had the bridge when I bought my house A11 dualling has made a difference to traffic flows, could you please release the survey data What about links for Rushford</p>	<p>The existing cycle routes can be found on the Sustrans website <a href="#">here</a>.</p> <p>Comments are a statement of personal opinion or preference</p> <p>Not sure what traffic data is referred to – Highways England or localised village survey?</p> <p>No specific new cycle routes have been suggested. Perhaps a more specific route could be suggested through the formal consultation in Spring 2017</p>	No change to Plan

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JNP7 page 36	4	Where are the existing facilities? CIL - zero rated?	Existing facilities are identified in the introductory chapters of this plan. They are however limited as the plan indicates.	No change to Plan
Policy JNP 7 Page 36	9	Phase 1 - Medical provision not seen !	The SUE currently only has outline permission with several matters "reserved" for determination by future applications. No construction can be started on site until this happens	No Change to Plan
Page 37 - JNP7	6	<p>This page has its priorities wrong. If you don't maintain your car and put petrol in it you are not going to go anywhere. Maintenance and petrol are your priorities.</p> <p>If you are unwell either physically or mentally you are in a similar position. Health comes first. No "ifs" no "buts", health comes first.</p> <p>It justifies its own bullet point at the top of the page not in a bracketed afterthought along with a "Place of Worship" in one of the two proposed community centres or just above a "Strategic Open Space"</p> <p>Unless Health is prioritised as first in the list you may as well forget the whole of this JNP.</p>	The bullet points follow the same order as the Section 106 which is the mechanism for delivering new facilities. Health facilities are featured in the first bullet point. This could be amended to put a more explicit reference to health facilities first.	Amend list to put health facilities as the first bullet point.



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Pages 39 and 40	4	Where are pages 39 and 40??	Refer to first comment on list	Action as first comment on list
JNP13 page 45	4	Character Assessments, as previously stated, inadequate to underpin and justify this Policy, Rushford residents had no opportunity to contribute to it	<p>The respondent appears to have misunderstood the longer-term process.</p> <p>The Character Appraisals were undertaken by local people. The Rushford Appraisal used a slightly different format to the others but does contain personal input from a number of residents. Clearly purely from a management perspective not everyone in the village can undertake the survey work as it would become unwieldy however the purpose of the informal consultation on the Character Appraisal was specifically to enable local people to comment upon it and contribute to it.</p> <p>Rushford residents had the same opportunity as the remainder of the residents in the JNP area to partake/comment on the character appraisal work during the informal consultation period.</p> <p>There will be further opportunities during the formal stages in Spring 2017.</p>	No change to plan
JNP14 page 47	4	Rushford, again, had no opportunity to influence this policy	See comments above in relation to process. The purpose of the informal consultation is to enable input from local people.	No Change to Plan

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Section 5 page 48	4	<p>Input and involvement from Community has been suppressed</p> <p>Who exactly will be involved</p> <p>What exactly is to be changed</p> <p>Where is the implementation plan?</p> <p>Who will provide leadership</p> <p>How can you monitor, you have no Clerk or Planning Dept.</p>	<p>Comments are an expression of personal opinion.</p> <p>The Implementation Plan will be produced once there is greater certainty around what the specific policies in the plan will say and how they will be monitored. This is an iterative process. Breckland Council will also be responsible for monitoring the plan and have specifically responded to confirm that</p>	No Change to Plan
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**Appendix K –Informal Consultation - Breckland Council Response****Croxtan and Brettenham & Kilverstone Joint Neighbourhood Plan - Informal Consultation Draft****From: Breckland District Council: Policy and Development Management comments**

<b>Page and Policy/ Paragraph No</b>	<b>Comment</b>	<b>Justification</b>	<b>Amendments</b>	<b>Parish Council Response</b>
Whole Plan	Agree with previous comments regarding more visual images, photographs, pictures, artistic impressions throughout the document. Particularly to supplement the vision section of the plan, show examples of what is meant by high design standards; important open spaces and views. In particular to support the design policies JNP1, JNP3, JNP4,	This will help get over the vision, make it more user friendly; add to the objectives policies and what they seek to secure.	Plans showing where the important views are, important gateways; photographs and examples of high quality development, what is distinctive about the area; locations of where improved links between villages would generally be.	Final version of plan will be professionally designed and therefore more visually attractive. Appropriate examples have been included in the Character Appraisal document. The documents are designed to be read together
Front cover	The time period that the plan covers is missing.		Add time period on the front cover.	Time period added to front cover

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p 7, Introduction, 4 <sup>th</sup> para	Include 'Site Specific Policies & Proposals (2012)' in list of higher level planning	For completeness.	Add reference to Site Specific Policies & Proposals (2012) in paragraph 4.	Plan amended accordingly
p 15, Croxton. 5 <sup>th</sup> para	The Neighbourhood Plan can set development boundaries, providing they are in general conformity with the strategic policies in the Local Plan. In this case, Croxton currently has a development boundary in the adopted Local Development Plan, but it is proposed to be removed in the emerging Local Plan. The Parish Council could choose to retain the settlement boundary in the Neighbourhood Plan, but should be aware that if the Neighbourhood Plan is in force prior to the adoption of the Local Plan, the more recent plan policy takes precedence. This is unlikely to be the case in this instance as the Local Plan is at an advanced stage of development.	The Neighbourhood Plan body are able to establish general planning policies for the development and use of land in a neighbourhood.	Remove sentence: <i>'it is not within the remit of this Joint Neighbourhood Plan to identify, remove, amend or alter settlement boundaries.'</i>	This section has been reworded to address the point made.
p 18, Working in Croxton, 1 <sup>st</sup> para,	Missing end part of sentence ending <i>'with a single'</i> .	Text omission.	3 <sup>rd</sup> line – complete sentence ending:	Plan amended accordingly

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line –				
p 7-21, Introduction and context section	The initial section of the Neighbourhood Plan should include wording on the Thetford Sustainable Urban Extension (SUE). Background information will set the context for policies applicable to the new growth area.	Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE and its purpose as a sustainable urban extension to Thetford.	Add context for Thetford SUE, which is currently missing.	Additional text has been added at 3.3 to give context of the SUE as well as new text after 1.5.

<p>p 22, Vision, (in bold)</p>	<p>Query whether it is appropriate to apply a desire for predominantly ‘<i>rural and tranquil</i>’ character to the SUE which by definition is an ‘<i>urban’ extension</i>’ for 5000 homes. Whilst within the parish, the SUE is directly adjoined to the large market town of Thetford, which has a very different character to the villages of Croxton, Kilverstone and Brettenham. It is entirely reasonable for the Neighbourhood Plan vision to seek to enhance and protect the rural and tranquil character of existing villages, but should recognise the connection between Thetford and its urban extension and consider how this sits with the vision for the urban extension contained in the adopted Thetford Area Action Plan (pg 21 and pg 81) and the outline planning application 3PL/2011/0805/O.</p>	<p>Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE and its purpose as a sustainable urban extension to Thetford.</p>	<p>Redraft vision in light of further consideration of the connection between the urban extension, Thetford and the rest of the parish.</p>	<p>Vision has been recast to emphasize the rationale behind the plan i.e. integration between the rural area and the SUE (not the SUE and the town which is a role for the TAAP).</p>
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p27, Policy JNP1 (no policy name)	<p>This policy fails to recognise the connection between the SUE and Thetford, stating that it must reflect the spatial, visual and historical context of the parish.</p> <p>Consideration should be given to creating separate design policies for the SUE and the rest of the parish in recognition of their different vision, densities, characteristics and relationship to Thetford.</p> <p>Query whether the policy provides full recognition of a range of housing types, for example affordable housing, sheltered accommodation or flats. Some of which will not have rear gardens, for example.</p>	<p>Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE and its purpose as a sustainable urban extension to Thetford.</p>	<p>Reconsider creating separate design policies for the SUE and the rest of the parish.</p>	<p>Do not agree. This undermines the purpose and rationale for the JNP. (See above)</p> <p>The TAAP already sets design principles for the SUE (TH20) and the outline planning application supporting information sets the design context. It is difficult to see what more a separate design policy for the SUE would expand upon.</p> <p>Policy has been amended to pick up the point about a range of house types</p>
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	Any policy that applies to the SUE should build upon existing policies in the Thetford Area Action Plan. The supporting text for the policy (page 28) justifies the approach to design in the wider parish (which presumably informs the character appraisal work) but does not provide justification for the policy to apply to the SUE.			
JNP1, bullet points	Overly onerous – requiring residents being able access rear gardens; and sufficient storage space for items stored in garages.		Simplify approach.	Do not agree that this is overly onerous, and it has been used in other NPs
p 30, Policy JNP3, 4 <sup>th</sup> para	– ‘ <i>Any hedgerow lost...</i> ’ It may not be possible to retain or replace all hedgerows in the SUE, however the masterplan for the SUE includes formal and semi-natural parkland and woodlands which ensures that opportunities to	The Neighbourhood Plan should support sustainable development and therefore policies should not be unduly restrictive.	Consider rephrasing the policy criteria on hedgerows so that it is less restrictive.	Policy has been reworded.



p 32, Policy JPN4	This policy fails to recognise the connection between the SUE and Thetford, and is repetitive when combined with policy JPN1. However, the wording of the last two paragraphs (page 32) is supported and could be incorporated into a revised policy for the SUE.	Recommended to show that the Neighbourhood Plan is prepared positively and recognises the significance of the SUE, and its purpose as a sustainable urban extension to Thetford.	Consider revising policy to create a design policy for the SUE which reflects the role of the SUE as an urban extension to Thetford in addition to the relationship with the rest of the parish and incorporates the detail on mixed communities, inclusive design and community consultation.	JNP4 is already a specific policy for the SUE. Do not agree that a separate design policy for the SUE is warranted as this would undermine the rationale of the plan in respect of a transitional integration between countryside and the urban extension. Policy wording has been amended as a result of other representations
p 34, Policy JPN5	The <del>final</del> policy should make explicit reference to the actual list of designated and undesignated heritage assets (which should be included in the plan, either in the supporting text or in an appendix).	Assists the reader to identify the heritage assets to which the policy applies.	Include the list of designated and undesignated heritage assets in the plan.	The policy will cross refer to the Character Appraisal which will contain the complete list

JNP5	Also goes beyond what is required statutorily and within local and national planning policy, as requiring it on all development proposals adjacent to CA's.	This would be onerous on very small-scale development to require a Heritage Statement.	Add in thresholds to policy.	Do not agree this is onerous given that this only applies to development likely to affect an undesignated or designated heritage asset. These are likely to be few in number. Applications for development in the SUE would be likely to be accompanied by a design statement in any event.
p 35, Policy JNP 6, 5 <sup>th</sup> para	Overly vague.	This would be onerous on very small-scale development to require a Statement, and should be more specific.	Add in thresholds. If there are already specific routes which have problems, identify them, and how issues prevented.	Policy is to be reworded as a result of other representations
6 <sup>th</sup> para 6.	All development will add to increased traffic flows, so it is not clear how this point can be satisfied. To require all development proposals to produce transport statements is considered unnecessary.	Norfolk County Council as Highways Authority provides advice on highways for planning applications and further information is requested from the developer when necessary.	Remove para 6.	NCC response did not raise an objection. Plan wording has been amended to clarify that this refers to significant increases in traffic only.

p 36, Policy JNP7	The policy on existing facilities is very similar to Core Strategy policy COM 4 in Breckland's adopted Development Plan which is being taken forward as policy DC18 in the emerging Breckland Local Plan.	The Neighbourhood Plan does not need to repeat policies in the adopted and emerging development plan.	Revise policy to remove areas of repetition with development Plan policies COM4 (emerging) and DC18 (adopted).	Agree policies are similar and also consistent. However, this underlines the importance placed on this issue by the Parishes.
New Facilities	Lacks detail and specifics. When is this required, should make clear what needs to be put towards and where.	Needs to meet the CIL /NPPF tests.	Add in thresholds for securing obligations; refer to more detailed/considered list of new projects to be put towards; or if no detail updated project list to include these will be appended, and monitored every 6 months/ year / 2 years etc.	Agree this needs more specificity and additional text has been added for clarification,

p38, Policy JPN8: employment	This policy requires further detail. How will existing employment sites be protected? Are there exceptions to this protection? e.g. the employment use is no longer viable or is not compatible with surrounding uses. How does this fit with permitted development rights for conversion to residential? What kinds of employment uses are inappropriate in the rural area? The Neighbourhood Plan could define significant employment sites that the policy is seeking to protect.	Consideration of the implementation of the policy is required.	Provide further detail in the policy wording. Consider outlining exceptions and defining significant employment sites.	Policy wording to be amended to identify the “significant” sites in each parish.
2 <sup>nd</sup> para	Bit vague in parts. Also, nearly all development will have an impact to some degree, positive or negative, so this needs to be qualified, by adding further consideration to policy to be clear on what is acceptable or not	Difficult to interpret and ultimately comply with.	. e.g. <del>Does it need to state</del> “...provided they do not <b>have an significant adverse</b> impact on the character of the area or the amenity of residents”.	Plan amended accordingly

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p41-47, JPN10, JPN11, JPN12, JPN13 and JPN14	The first line of the policies should say the area the policy refers to e.g. within Croxton settlement boundary, or within Croxton ward boundary. This should be cross referenced to a map included in the Neighbourhood Plan. It would be helpful to outline the areas referred to in policies JPN11, JPN12 and JPN14 on a map within the Neighbourhood Plan – even if this is only broad locations.	To provide clarity of the area the policy applies to (if not the whole neighbourhood area).	Define areas the policy applies to.	Agree that the area to which these policies applies should be defined. Character area maps are to be added.
JNP10	Needs additional graphics, photographs and images to demonstrate what is important.	Additional detail and justification are required to provide evidence for the policy.	Provide additional photographs of examples of materials, buildings. Also, additional text on supporting national and local policy justification.	The policy will be cross referred to the Character Appraisal which contains this information

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JNP11	Vague, lacks any detail and specifics.	It will not be of any use if lacks sufficient detail.	Include a list of what type of measures may assist in enhancements; i.e. landscaping and planting; footpath improvements; signage/wayfinding etc. This could then link to community project list and obligation monies via s106/CIL. Include site specific characteristics, design principles for any scheme at the Vicarage?	Policy has been recast to remove reference to enabling development at the Vicarage as a result of other consultation responses
JNP12	Policy needs rewording as overly onerous.	Fails to comply with national, local planning policy and unlikely to be supported in planning terms	Suggest an overarching policy objective; then a series of criteria for which any development proposals would have to meet. Then subsequent set of criteria for when re-development / demolition would	Policy wording has been amended.

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			be allowed, i.e. when supported by development viability assessment (accords with RICS guidance).	
JNP13	See comments for JNP10	See comments for JNP10	See comments for JNP10	The policy will be cross referred to the Character Appraisal which contains this information

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JNP14	See comments for JNP 11	See comments for JNP 11	Suggest another tier to the policy including set of criteria for each are identified. i.e. what form, type of development and improvements would be supported for each and would enhance each. This could then link to community project list and obligation monies via s106/CIL. Include site specific characteristics of each.	Policy wording has been amended
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**Appendix L – Informal Consultation – Breckland Council Technical Comments****Croxtan and Brettenham & Kilverstone Joint Neighbourhood Plan**

From: Breckland District Council.

<b>Page and Policy/ Paragraph No</b>	<b>Comment</b>	<b>Justification</b>	<b>Amendments</b>
Whole plan	Document Structure – generally well structured, but needs to be developed.	To enable effective tracking of comments as the plan progresses during consultation, examination and future use of the document e.g. an appeal.	Add paragraph numbers throughout Replace bullet points in policies with either letters or numbers to aid referencing. Also check spacing between bullet points.
Whole plan	Use of images – the plan would benefit from including photographs of buildings and other structures around the villages, as well as charts, tablet etc where relevant.	Having different methods to display information will make the document more accessible to the public as they have different learning styles.	Consider as commented.
Whole plan	Use of red text can cause problems for those with sight problems.	Make the colour darker.	
	Text (font) size is varied in some of the policies e.g. JNP10 & JNP13.	RNIB recommend a minimum of 12pt font to assist those with visual disabilities.	Ensure the plan font size consistent and is at least 12pt throughout.
p9 – 13 Maps	The north compass rose is missing from all the maps. Also, it would be useful to locate the maps near to the text where they apply.	Add compass rose to the maps.	
p9 Maps	The key should make it clear that the SUE was originally designated in the Thetford AAP?		

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p12-13 Maps	Why is the settlement boundary and CA not on the same map?		
p14	Croxton – 2 <sup>nd</sup> para. This state “It includes a typical Breckland Village...”		This should clarify what a “typical Breckland Village” is.
p15	Brettenham & Kilverstone – 2 <sup>nd</sup> para. Reference is made to “The Brecks” landscape without explaining what this is.	Those living outside the area, but needing to use this “development plan” will not necessarily know what “The Brecks” are.	Explain what “The Brecks” are.
p22 Vision	It has not been made clear in the Vision where the SUE has been allocated.		Make clear that the SUE has been allocated in the emerging Local Plan and not the Neighbourhood Plan.
p27 Policy JNP1:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.

p30 Policy JNP3:	What features are “typical of the Brecks area?”		This need to be listed either in the policy or the relevant paragraph in the reasoned justification in order to be implemented.
p32 Policy JNP4:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
	<i>Has the issue of “Designing out crime” ever been address in consultation?</i>		
p36 Policy JNP7:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
p39 Policy JNP9:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
	The reference to “Map X” is not clear.		
p41 Policy JNP10:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
p43 Policy JNP11:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
p44 Policy JNP12:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
p45 Policy JNP13:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.
p47 Policy JNP14:	It would be better if the criteria were either numbered or lettered.	To aid referencing.	Either add numbers or letters to criteria.

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p48 Monitoring:	It is not accurate to state that the Parish Councils are responsible for monitoring; this lies with Breckland Council, the local planning authority.		Amend the text to reflect the requirements of the regulations
p49 Appendix X	This map should be in the main body of the plan as it clarifies where the strategic gaps are.		
	There is no reference in the key or on the map which is strategic gap being which.		Make clear on the map which Strategic gap is 1 & which is No 2.

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<b>Typo's</b>			
p22 Housing	There is a line gap between the 2 <sup>nd</sup> & 3 <sup>rd</sup> bullet		Remove line gap so spacing is uniform.
p23 Environment	The first four bullet points are out of line with		Reposition the first four bullet points.
	There is a line gap between the 4 <sup>th</sup> & 5 <sup>th</sup> bullet		Remove line gap.
p25 Section 4 Draft policies	Not clear why, at the start of this chapter, the		
p27 Policy JNP1:	Title of policy is missing.		
4 <sup>th</sup> paragraph:	4 <sup>th</sup> para – an additional “I” between “should”		Remove unrequired “I”.
p30 Policy JNP3:	1 <sup>st</sup> para – first word is indented.		Remove indentation.
	2 <sup>nd</sup> para – full stop is missing from the end of		Add full stop.
p32 Policy JNP4:	4 <sup>th</sup> para – full stop is missing from the end of		Add full stop.
p39 Policy JNP9:	2 <sup>nd</sup> para – full stop is missing from the end of		Add full stop.
	3 <sup>rd</sup> para – first word is indented.		Remove indentation.
	2 <sup>nd</sup> set of bullet points - There is a line gap between the 4 <sup>th</sup> & 5 <sup>th</sup> bullet points.		Remove line gap.
p41 Policy JNP10:	2 <sup>nd</sup> para – full stop is missing from the end of		Add full stop.
p43 Policy JNP11:	2 <sup>nd</sup> para – full stop is missing from the end of		Add full stop.

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p45 Policy JNP13:	1 <sup>st</sup> para & 3 <sup>rd</sup> set of bullet points has larger text		Make size of the text consistent with
p45 Policy JNP14:	2 <sup>nd</sup> para - full stop missing from end of sentence.		
p48 Monitoring:	1 <sup>st</sup> para – full stop missing from end of sentence.		Add full stop.
	2 <sup>nd</sup> para – first word is indented.		Remove indentation.
	2 <sup>nd</sup> para – text in 2 <sup>nd</sup> sentence, is larger than		

**Appendix M – Screening Re-Determination – January 2017**



**Strategic Environmental Assessment  
Re-Screening Determination  
Croxtan and Brettenham & Kilverstone  
Joint Neighbourhood Plan  
January 2017**

# **Neighbourhood Planning Strategic Environmental Assessment Screening Report**

## **Contents**

- 1. Introduction**
- 2. Legislative Background**
- 3. Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan**
- 4. SEA Screening**
- 5. Assessment**
- 6. Screening Outcome**

## **Appendix 1: Statutory Consultee Responses**



## 1. Introduction

1.1.Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.

1.2.Establishing whether a Neighbourhood Plan has been subject to a SEA is an important legal requirement. The Independent Examiner appointed to consider the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan will check that it meets the 'Basic Conditions' set out in national Planning Practice Guidance (PPG)<sup>1</sup>. One of the Basic Conditions is whether the Croxton and Brettenham & Kilverstone Joint is compatible with European Union obligations.

1.3.This screening report is designed to determine whether or not the contents of the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan require a SEA in accordance with the European Directive 2001/42/EC and the associated Environmental Assessment of Plans and Programmes Regulations (2004)<sup>2</sup>.

1.4.The legislative background set out in section 2. outlines the regulations that require the need for this screening exercise.

1.5.The policies of the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan are set out in section 3.

1.6.To assess whether an SEA is required, a screening process must be undertaken based on a standard set of criteria. This must be subject to consultation three statutory consultees of the Environment Agency, Historic England and Natural England. The results of the screening process must be detailed in a Screening Report, available to the public.

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<sup>1</sup> <http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>

<sup>2</sup> <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

## 2. Legislative Background

1.7. The basis for SEA legislation is European Union Directive 2001/42/EC<sup>3</sup> which requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations.

1.8. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the District Council must determine if a plan requires an environmental assessment. Where the Council determines that SEA is not required, then the Council must, under Regulation 9(3), prepare a statement setting out the reasons for this determination.

1.9. In accordance with Regulation 9 of the SEA Regulations 2004, Croxton and Brettenham & Kilverstone Joint Parish Council (the qualifying body) has requested Breckland District Council, as the responsible authority, to consider whether an environmental assessment of the emerging Neighbourhood Plan is required due to significant environmental effects.

1.10. Whether a neighbourhood plan requires an SEA, and if so, the level of detail needed, will depend on what is proposed in the draft neighbourhood plan (see PPG Paragraph 046). The PPG suggests that SEA may be required, for example, where:

- a neighbourhood plan allocates sites for development;
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan (LP).

## 3. Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan

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<sup>3</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

1.11.Croxton and Brettenham & Kilverstone Joint NP (Informal Consultation Draft) is in its draft pre-submission consultation stage. The information provided for the need to re-screen, in light of the above document, it can be stated that:

- In terms of environmental assets, the area does not encompass any Area of Outstanding Natural Beauty, National Park, or National Nature Reserves
- In terms of protected sites, the following European Designated Sites are present within the Neighbourhood Plan Boundary as shown on Figure 3 of the Informal Consultation Draft. Plans must be assessed to ensure the policies within them do not result in likely significant effects
- European Designated Sites are designated under the EC Habitats Directive which is transposed into UK legislation through the Conservation of Habitats and Species 2010 (as amended). These European Designated Sites are:
  - Breckland Special Protection Area (SPA). The SPA holds internationally important breeding populations of stone curlew, nightjar and woodlark. Stone curlew establish nests on open ground provided by arable cultivation in the spring, while woodlark and nightjar breed in recently felled areas and open heath areas within the conifer plantations
  - Breckland Special Area of Conservation (SAC) The SAC is primarily designated for European dry heaths, semi natural dry grasslands, natural eutrophic lakes, and inland dunes with open *Corynephorus* and *Agrostis* grasslands
- The Breckland SPA is underpinned by following SSSIs which are protected under the Wildlife & Countryside Act 1981 (as amended):
  - Breckland Forest SSSI
  - Bridgham & Brettenham Heaths SSSI
  - Breckland Farmland SSSI
- The area includes a number of County Wildlife Sites, including The Forest, Snarehill Meadow, Oakwood, Halfmoon Meadows, Kilverstone Meadow, as well as land adjacent to the River Little Ouse and River Thet
- There are flood zones 2 and 3 around the River Thet and Little Ouse River which are main rivers
- The NP will not propose a higher level of development than is already identified within Breckland's LP
- The policies within the plan are not likely to lead to any major new development or infrastructure, nor are they likely to have any significant adverse effects on any SEA topic

- The NP will not allocate land in and above that identified within the Breckland Site Specific Policies and Proposals document

The policies to be considered in the SEA Screening Opinion are:

## **HOUSING**

### **JNP1 Housing Design and Materials**

Any new development will need to reflect the existing form and structure of the relevant settlement, respecting the planning policies of the local planning authority. It will also need to reflect and complement the rural character and cultural history of the area.

New buildings should respect the vernacular design of existing buildings in the parish, and should allow adequate space between buildings to retain the form and character of the parish.

The design of new residential development both within and outside of the SUE (Sustainable Urban Extension) should deliver high quality design and not adversely impact on *the* essentially rural character and appearance of the parish.

Any new dwelling, redevelopment or extension to a dwelling should be carefully designed to avoid conflicting with adjacent properties or landscape and should help to maintain the rural character of the village and parish.

To achieve this:

Development proposals should have careful regard to the height, layout, building line, massing, scale of existing development in the immediate area;

- Rear gardens should be at least equal to the ground floor footprint of the dwelling;
- Residents should be able to access the rear garden without going through the house;
- Sufficient external space should be provided to enable refuse, recycling and compost to be stored out-of-sight. There should also be sufficient storage space for items commonly stored in garages;
- The use of traditional materials common in the parish (as identified in the Character Appraisal work), especially those sourced locally and of low ecological/ environmental impact, will be encouraged;
- Where possible, existing natural features such as trees or hedgerows should be retained, unless their removal results in an ecological gain or an improvement to green open space or important views.

A mix of designs and styles design variety within the SUE is essential but it must reflect the prevalent design and detailing of buildings within the parish (as identified in the Character Appraisal) and respect the spatial, visual and historical context of the parish.

### **Comments**

Additional policy wording suggested for the third paragraph:

*“...and not adversely impact on the **protected sites, and the** essentially rural character and appearance of the parish”.*

And for the fifth paragraph:

*...“regard to the height, layout, building line, massing,,~~and~~ scale of existing development in the immediate area **and indirect impacts to protected sites through increased access and recreational pressure;**”*

This should ensure that developments that risk affecting European Protected Sites will be reviewed under the Habitats Regulations as policy CP10 (of the adopted LDF) covers this.

### **JNP2 Housing Density**

New residential development should have a density that is consistent and compatible with the existing prevailing density in the immediate area (as identified in the Character Appraisal) in order to reflect the local character and appearance.

Higher densities may be acceptable within the central areas of the SUE, but it will be expected that there would be a gradual decrease in density at the edges of a proposed development where the character becomes more rural and closer to existing rural development.

### **Comments**

Additional policy wording suggested for the end of the policy:

***New developments will need to consider direct and indirect impacts to the European Protected sites and SSSIs within the neighbourhood plan area in order to be compliant with the Habitats Regulations. Impacts can result from direct land take or disturbance or from indirect impacts from recreation and access associated with new housing developments.***

This additional policy wording would make the policy stronger. The housing policies are the ones most likely to result in adverse impacts to protected sites as increased housing is required and likely to be promoted.

## **ENVIRONMENT**

### **JNP3 Enhancing village gateways and protecting local landscape character**

The visual and scenic value of the landscape and countryside surrounding the parish will be protected from development that may adversely affect this character, with particular consideration given to the more sensitive areas and features such as those considered to be typical of the Brecks area.

Undeveloped gaps between settlements or parts of a settlement which contribute to the character of the area will also be protected. (See Policy JNP9 - Strategic Gaps).

Proposals that will enhance the visual appearance of an approach or “gateway” to a village (or part thereof) will be supported and opportunities to improve the public realm in these areas through the use of appropriate hard or soft landscaping measures will be encouraged.

Any hedgerow lost as a result of proposed development will be expected to be compensated elsewhere within the site, if possible, or elsewhere in the vicinity

Proposals that would lead to the enhancement of ecological networks will be encouraged, particularly where they would further support the management of the designated sites and improve habitat connectivity.

**Comments:**

Additional policy wording suggested for the end of the fourth paragraph:

*“... if possible, or elsewhere in the vicinity **and achieve a net gain in biodiversity in the neighbourhood plan area through the creation of high quality habitats, connectivity to other habitats in the landscape and the use of locally characteristic species.***

And for the fifth paragraph:

*“... support the management **and protection** of the designated...”*

Additional policy wording suggested for the end of the policy:

***Proposals that demonstrate a net gain in biodiversity and creating, enhancing or protecting ecological networks will be encouraged to achieve Government Biodiversity and Planning Policy.***

Current NPPF promotes permitting sustainable developments and net gains in biodiversity should be achieved where possible. This is also in government planning policy and the Biodiversity 2020 Strategy so could fit well in this NP policy about enhancing landscape character.

**URBAN EXTENSION**

**JNP4 Integrating new development within the SUE (Sustainable Urban Extension) with the existing development in the parish** [SITE ALLOCATED IN THE EMERGING BRECKLAND LOCAL PLAN]

In order to maximise the integration of new and existing development, new development within the proposed Sustainable Urban Extension (SUE) should be designed to reflect the character, form, style and materials of the parish as identified in the relevant Character Appraisal.

New developments within the SUE should respect the rural nature of the village and where possible urban-style elements should be discouraged.

In particular, developments should ensure that housing proposals respect the rural nature with regard for the following:

- Density should reflect that of neighbouring housing within the vicinity of the proposal, (see Policy JNP2);
- Use of native species soft landscaping to provide new habitats for local wildlife, particularly along frontages; And
- Use of materials that reflect and respect the local vernacular.

The JNP seeks to ensure that house builders design inclusive and mixed communities that reflect the physical characteristics of the parishes and support integration and cohesion between new and existing communities, by making sure affordable housing is well integrated with the market housing, that housing is sympathetically designed to reflect the local context and that proposed developments include opportunities for people to meet formally and informally

Encouragement will be given for developers to consult meaningfully and engage with the local communities as development proposals are progressed to show how the views of the local community have been considered in any subsequent planning applications.

#### **Comments:**

Additional policy wording suggested for the end of the policy:

***Urban extension will need to consider impacts to the European Sites in combination with existing permitted developments such as the SUE.***

***Planning and government policy aims to permit sustainable development that achieves a net gain in biodiversity and landscape scale ecological networks are conserved, enhanced or created through the planning function.***

The first new paragraph could be incorporated into the policy as the SUE has the potential to impact on protected sites and additional development will need to consider impacts in combination with the already permitted developments.

The second new paragraph is suggested to make it clear that integrating development into the SUE would also need to achieve sustainable design.

## **HISTORIC ENVIRONMENT**

### **JNP5 Historic Environment and Character**

New development in the parish in close proximity to designated or undesignated heritage assets should take account of the historic fabric of the area and preserve or enhance the

character or appearance of the Croxton Conservation Area, the Listed Buildings, protected trees and/or other heritage assets as identified in the relevant Character Appraisal.

In order to achieve this, a “Heritage Statement” shall be provided in support of all development proposals within or adjacent to the Croxton Conservation Area, Listed Buildings, or other designated or undesignated heritage assets. Such Heritage Statements should outline the significance of any heritage assets affected and any adverse impacts that the development may have on heritage assets. It shall also include any proposed mitigation measures, as well as how the proposed development will contribute to the character and setting of the relevant heritage asset and the wider parish.

### **Comments**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

## **TRANSPORT**

### **JNP6 Transport and Highways Safety**

Development will be expected to ensure that there is no detriment to highway safety and, where possible, help to reduce existing risks.

New footpaths should form part of a coherent network and aim to encourage pedestrian alternatives to using through roads.

Proposals that include measures to enable improved levels of walking and cycling by residents will be considered favourably.

Any adverse impacts arising from the residual traffic generated should be mitigated where this is viable and of a scale that is commensurate with the development.

New development should be designed to ensure that it avoids the risks of creating “rat runs” or adding to traffic movements or speeding on rural roads elsewhere in the parish.

Development proposals should include a statement as part of the application that sets out and demonstrates how the new development will either not add to increased traffic flows, or risks to highway safety or how any increase will be minimised, and its adverse effects mitigated to ensure that no parish roads become ‘rat-runs’.

### **Comments:**

Footpaths should also be designed to avoid increasing access and recreation to protected sites which can have a negative impact on protected sites and the features for this they’re designated for. Equally where recreational impacts are having a negative impact on the protected sites footpaths and access points should be managed to minimise or avoid these impacts.



In light of this appropriate wording should be included. This is because indirect impacts such as increases in recreation and access can have detrimental impacts to protected sites. Therefore, to ensure the design of public rights of way or footpaths do not negatively impact protected sites, this should be recognised in this way.

### **JNP7 Community Facilities**

#### **Existing Facilities**

Proposals for change of use involving a potential loss of existing facilities, will only be permitted where it can be demonstrated that:

- An improved or equivalent facility can be satisfactorily relocated to elsewhere in the village; or
- Adequate other facilities of the same service offering exist within a reasonable walking distance of the majority of residents to meet local needs; or
- There is no reasonable prospect of continued viable use and this can be demonstrated through:
  - a) Twelve months of marketing for the permitted and similar uses, using an appropriate agent; and
  - b) Confirmation that it has been offered on a range of terms (including price) agreed to be reasonable on the advice of an independent qualified assessor.

#### **New Facilities**

Where, as a result of a new development both inside the SUE, or outside, there is the facility for funds to be provided by the developer for the local community, whether through S106, Community Infrastructure Levy or other arrangements the community should be consulted on its priorities for spending that money.

The design of new community facilities in the SUE should reflect local materials and styles and be designed in such a way as to ensure full integration into the existing landscape and village character. Facilities should be designed to be attractive and available to new and existing residents both inside and outside of the SUE.

#### **Comments:**

There are no issues with this policy in terms of Habitats Regulations or biodiversity other than if a community facility was built in a location that could impact on the protected sites which would be addressed through planning determination.

### **EMPLOYMENT**

#### **JNP8 Employment**

Existing sites in current employment use will be protected and proposals that result in their retention including small scale extensions will be supported provided they are appropriate for a rural area and do not have an adverse impact upon the rural character of the area, or

the amenity of local residents either through their built form, proposed use or traffic generated.

New small-scale employment uses appropriate to a rural area will be encouraged, especially those that contribute to the social fabric of the parish, provided they do not impact on the character of the area or the amenity of residents.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

**SPECIFIC AREA POLICY**

**JNP9 Strategic Gaps**

The visual and scenic character of the attractive countryside within the parishes will be protected from development that would have an adverse impact on the important landscape quality of the Brecks landscape

Particular consideration will be given to protecting undeveloped areas between settlements or parts thereof – these are identified as “Strategic Gaps” on MAP X and in the relevant Character Appraisals

The objective of this policy, within the Joint Neighbourhood Plan Area, is to direct development in such a way as to respect the definition and separate characters of the settlements of Croxton, Brettenham, Kilverstone and Rushford and the neighbouring settlement of Thetford.

- South of Croxton Village between the village and the A11 by-pass – Strategic Gap 1
- Between Kilverstone and Brettenham (north and south of the C148 Brettenham to Kilverstone Road) – Strategic Gap 2

See Map X [*SEE APPENDIX A*]

In order to:

- Respect the separate character and identity of settlements (and or parts of the settlement) including their setting;
- Support and enhance the predominantly open and undeveloped character of the landscape within these gaps;
- To protect and enhance the environmental importance of the Brecks landscape, its flora, fauna and landscape character and
- To prevent coalescence of settlements

Within the Gaps approval will only be given for the construction of new buildings or the change of use of existing buildings or land provided that it does not:

- Result in erosion of the physical gaps between built up areas; or
- Adversely affect the visual character or scenic beauty of the landscape,

Development will only be permitted if it individually or cumulatively does not result in the actual or perceived coalescence of settlements (or parts of a settlement), including through:

- visual intrusion which reduces the openness and 'break' between the settlements;
- and,
- a significant increase of activity which has an urbanising effect on the area.

**Comments:**

Additional policy wording suggested at the end of the first paragraph:

*"...the important landscape quality of the Brecks landscape **and its protected sites**".*

This has been suggested to acknowledge specifically that the protected sites make up the landscape quality of the Brecks

And an additional bullet point for the sixth paragraph:

**• "Adversely affect the European Protected Sites"**

This could be added to make it clear that developments that adversely affect European Protected Sites would not be approved and ties in with the bullet point in the list above.

**JNP10 Character Appraisal for Croxton**

The Character Appraisal for Croxton has identified the following as important and distinctive materials and details that contribute to the overall character and local distinctiveness of the village:

- Flint construction/finish
- Slate or pantiled roofs
- Gault brick details or brick dressings

In accordance with JNP1 new built development of any scale or use should seek to incorporate these important characteristic details within the design of the scheme

In addition, the Croxton Character appraisal has identified the following unlisted building as having made an important historic, cultural, environmental or community contribution the character of Croxton and these will be treated as undesignated heritage assets in accordance with Policy JNP5:

- The Vicarage
- Methodist Chapel
- Village Shop and Post Office
- The School House
- The Old Bell House
- The Royal Naval Association Club
- Hill Rise Cottages

The Parish Council will strongly encourage Breckland Council to positively consider the preparation of a Local List for Croxton which includes these buildings.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

**JNP 11 Areas for Enhancement in Croxton**

The Character Appraisal for Croxton identifies the following areas as potential opportunities for enhancement:

- The Approach to Croxton village from the south
- The Vicarage

Proposals that would result in a positive visual, environmental or historic enhancement to the above areas will be supported provided that they are of a suitable scale and design and do not detract from the overall character of the area and are consistent with other policies with this JNP.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

**JNP12 Brettenham and Kilverstone Alms Houses**

The re-development of the existing Kilverstone Alms Houses will be permitted only where it can be demonstrated that the existing Alms Houses are no longer viable in their current form and are beyond economic repair and that this is supported by an independent viability assessor. New development on this site will only be permitted for affordable units only.

Proposals for redeveloping the site, including demolition will be allowed, subject to meeting the relevant policies of the local planning authority and would need to satisfy all of the following criteria:

There will be no net loss of accommodation available

The redevelopment would enhance, the form, character and setting of this part of the village and there will be no adverse impact upon the village as a whole

There will be no detrimental impact on ecology or landscape.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

**JNP13 Character Appraisal for Brettenham and Kilverstone**

The Character Appraisal for Brettenham and Kilverstone has identified the following as important and distinctive materials and details that contribute to the overall character and local distinctiveness of the parish

- Brettenham – Brick and render, tiles or slate, Brick with Flint facades

- Tiled or slate roofs – occasional thatch roofs
- Kilverstone – flint with slate or red pantiled roofs

In accordance with JNP1 new built development of any scale or use should seek to incorporate these important characteristic details within the design of the scheme

In addition, the Brettenham and Kilverstone Character appraisal has identified the following unlisted building as making an important historic, cultural, environmental or community contribution the character of the villages and these will be treated as undesignated heritage assets in accordance with Policy JNP5:

Brettenham –

- The Stallion boxes

Kilverstone –

- Ex POW huts,
- Lodge Farmhouse,
- 1-4 Fountain Cottages,
- Park House,
- 1 and 2 Farm Gate,
- 1 and 2 Shepherd's Cottages

The Parish Council will strongly encourage Breckland Council to consider positively the preparation of a Local List for Brettenham and Kilverstone which includes these buildings.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations.

**JNP 14 Areas for enhancement in Brettenham and Kilverstone**

The Character Appraisal for Brettenham and Kilverstone identifies the following areas as potential opportunities for enhancement:

- Brettenham - Disused railway station site on corner of Arlington Way
- Farm buildings on the Kilverstone Estate, however considered to be in a fragile state but programme of restoration and re use is planned

Proposals that would result in a positive visual, environmental or historic enhancement to the above areas will be supported provided that they are of a suitable scale and design and do not detract from the overall character of the area and are consistent with other policies with this JNP.

**Comments:**

There are no issues with this policy in terms of Habitat Regulations or biodiversity considerations. The policy mentions environmental which could cover biodiversity enhancements although this isn't particularly specific.

## 2. SEA Screening

2.1.The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the SEA Directive and Schedule I of the SEA Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: The Environment Agency, Natural England and Historic England.

2.2.Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out in Table 1 below:

**Figure 1: Criteria for Determining the Likely Significance of Effects.**

1. The characteristics of plans and programmes, having regard, in particular, to
  - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
  - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
  - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
    - environmental problems relevant to the plan or programme,
  - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
  - the probability, duration, frequency and reversibility of the effects,
  - the cumulative nature of the effects,
  - the trans-boundary nature of the effects,
  - the risks to human health or the environment (e.g. due to accidents),
  - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - the value and vulnerability of the area likely to be affected due to:
    - special natural characteristics or cultural heritage,
    - exceeded environmental quality standards or limit values,
    - intensive land-use,
  - the effects on areas or landscapes which have a recognised national, Community or international protection status.

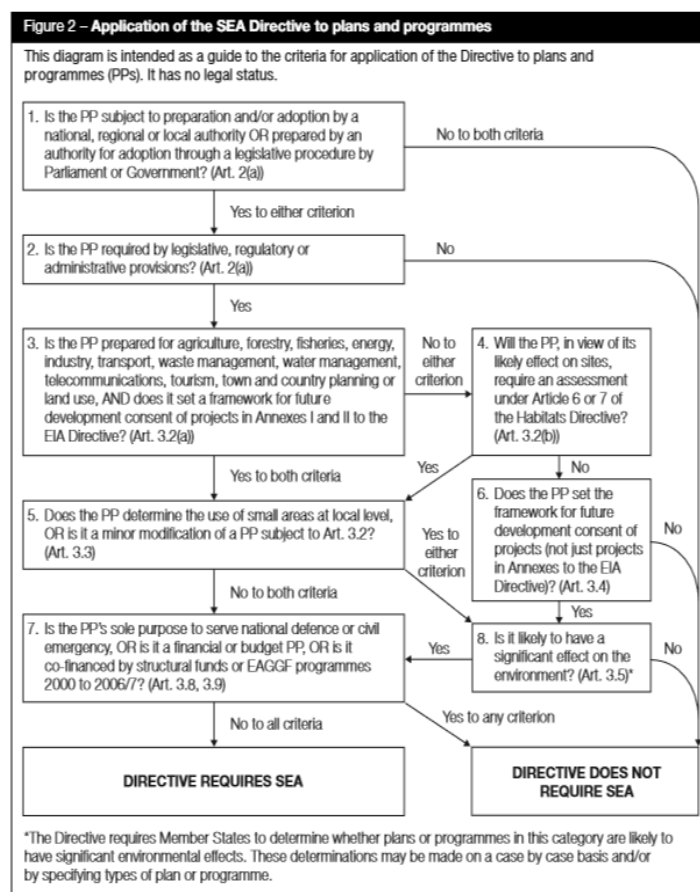
Source: Annex 11 of SEA Directive 2001/42/EC



### 3. Assessment

3.1. The SEA screening is a two-stage process. The first part considers the Neighbourhood Plan against the SEA assessment criteria set out in the national guidance, 'A Practical Guide to the Strategic Environmental Assessment Directive'<sup>4</sup>. The second part of the assessment considers whether the NP is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004<sup>5</sup>.

3.2. The process shown has been undertaken and the findings can be viewed in the figure below and in Table 1 which follows. This sets out how the SEA Directive should be applied.



(Source: Annex 11 of SEA Directive)

<sup>4</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>5</sup> [http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf)

**Table 1: Application of the SEA Directive to the Croxtan and Brettenham & Kilverstone Joint Neighbourhood Plan****Assessment 1: Establishing the need for SEA**

STAGE	Y/N	REASON
1. Is the Neighbourhood Plan (NP) subject to preparation and/or adoption by a national, regional or local authority or prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the NP is permitted under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP is being prepared by Croxtan and Brettenham & Kilverstone Parish Councils (as the “relevant bodies”) and will be “made” (adopted) by Breckland District Council as the Local authority subject to passing an independent examination and community referendum. The preparation of the NP is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012, the Neighbourhood Planning (referendums) Regulations 2012, and the Neighbourhood Planning (General) (Amendment) Regulations 2015.
2. Is the NP required by legislative, regulatory or administrative provisions? (Art.2(a))	Y	Whilst the NP is not a requirement of the Town and Country Planning Act, as amended by the Localism Act 2011, it will be “made” and eventually form part of the Development Plan for the District. These are directed by legislative processes and it is important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.
3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	A NP can include these policy areas and could provide, at a Neighbourhood Area level, the framework for development that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are ‘excluded’ development for NPs (as set out in Section 61(k) of the Town and Country Planning Act 1990 (as amended). The NP is prepared to set out a framework for town and country planning and land use within the parishes of Croxtan, Brettenham and Kilverstone. The strategic framework for development is set by the adopted Core Strategy and the emerging LP of the Breckland District Council. The NP seeks to align and be in general conformity with this.

		The NP does not anticipate being the tool to manage development of the scale and nature envisaged by Annex I and Annex II of the EIA Directive.
4. Will the NP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art.3.2(b))	N	<p>A NP could potentially have impacts on sites covered by the Habitats Regulations.</p> <p>A Habitats Regulations Assessment (HRA) Screening Report (2013) and the Assessment of the Breckland LP at Preferred Directions stage (2015) were carried out as part plans preparation.</p> <p>The policies within this NP do not state higher targets for development than the Breckland LP and promotes sustainable development together with considerations relating to local character and need. Impacts of individual applications for development would be considered in the determination of planning applications as they come forward which will include impacts, alone and in combination with other projects, in relation to European Sites. Therefore, no additional likely significant effects are anticipated from the policies themselves in this document.</p>
5. Does the NP determine the use of small areas at local level, or is it a minor modification of a PP subject to Art 3.2? (Art 3.3)		A NP can determine the use of small areas at a local level. The NP proposes to include policies relating to the design of development, but does not propose to specifically allocate land for development.
6. Does the NP set the framework for future development consent of Projects (not just projects in Annexes to the EIA Directive)? ( Art 3.4)	Y	Once 'made', a NP forms part of the statutory Development Plan and will be used in the determination of planning applications in the Neighbourhood Area. Therefore, it sets the framework for future developments at a local level.
7. Is the NP sole purpose to serve national defence or civil emergency, or is it financial or budget PP, or is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? ( Art.3.8,3.9)	N	The NP does not deal with these categories.
8. Is it likely to have a significant effect on the environment	?N	The NP seeks general conformity with the "adopted" Core Strategy and has regard to the emerging LP. No specific development is proposed through the plan, nor is land allocated for development through the plan. It

		is therefore considered that the plan would not have a significant effect on heritage assets, landscape, biodiversity interests or areas of flood risk.
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5.3The Environment Agency, Natural England and Historic England were consulted on the requirement for SEA for the NP. The responses received are attached in Appendix 1.

## SEA Screening Stage 2: SEA Directive Article 3(5) Annex II – Application of Criteria for determining the likely significance of effects of a Neighbourhood Plan

5.4 Table 2 below sets out the assessment against the Strategic Environmental Assessment criteria for the NP. This is to determine whether the implementation of the Neighbourhood Plan will have a significant effect on the environment. This criteria against which the screening is carried out are taken directly from Annex II of the European Union Directive 2001/42/EC (also known as the SEA Directive), as required by Article 3(4).

**Table 2: SEA Screening Stage 2 - Assessment of the Likelihood of Significant Effects on the Environment**

Criteria in Annex 11 of the SEA Directive	Response	Is there a significant effect?
(1) Characteristics of the plan and programmes, having regard, in particular, to:		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size, and operating conditions or by allocating resources;	The strategic framework for development is set by the adopted Core Strategy and the emerging LP of Breckland District Council. The NP seeks to align and be in general conformity with this.	No
The degree to which the plan or programme influences other plans or programmes including those in a hierarchy;	The NP will be adopted alongside the higher order LP and form part of the District's Development Plan. The NP will expand upon some of the emerging LP policies, providing supplementary information on a local scale.	No
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	Any development that comes forward through the NP will be subject to environmental considerations of the Core Strategy and the LP when adopted. These policies have been subject to sustainability appraisal, and are in place to ensure that sustainable development is achieved.	No
Environmental problems relevant to the plan or programme;	There are not considered to be any significant environmental problems	No

	which are specific to the area, above and beyond those considered and addressed in the LP. The NP may include policies (JNP3 & 4) which provide additional environmental protection.	
The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	The implementation of community legislation is unlikely to be significantly compromised by the NP.	No
<b>(2) Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
The probability, duration, frequency, and reversibility of the effects;	The NP is a long-term plan up to 2036. It does not seek to allocate sites for growth. However, potential for additional residential development opportunities are likely in relation to the re-development of the existing Alms houses, but only where it can be shown that they are no longer viable.	No
The cumulative nature of the effects;	It is considered unlikely that the degree of development proposed through the Neighbourhood Plan when combined with the Core Strategy and the emerging LP will introduce significant environmental effects although as projects come forward they will need to be considered alone and in combination with other projects in relation to European Protected Sites in the determination of planning applications. Whilst both documents are being written, the LP will be subject to full SEA and HRA screening.	No
The transboundary nature of the effects;	The impacts beyond the parish are unlikely to be significant.	No

The risks to human health or the environment (e.g. due to accidents);	The NP is unlikely to produce any significant effects.	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan covers the parishes of Croxton, Brettenham and Kilverstone with a population of 1,000 (Census 2011). The spatial extent and the magnitude of the population affected are not considered significant for the purpose of the SEA.	No
<p>The value and vulnerability of the area likely to be affected due to:</p> <p>i) Special natural characteristics or cultural heritage;</p> <p>ii) Exceeded environmental quality standards or limit values</p> <p>iii) Intensive land use</p>	<p>i)The NP area and adjacent areas contain a number of environmental designations. The NP will however conform to the LP, which provides protection to these environmental characteristics to ensure that they are not vulnerable to significant impacts from development. However, there are potential effects from other policy proposals in the emerging Local Plan that are not covered in detail in the NP.</p> <p>ii)The NP is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water, and soil quality and individual applications would be screened against environmental legislation through the determination of planning applications.</p> <p>iii)The NP is unlikely to bring forward development of an extent that would result in a significant intensification of Local Land Use and individual applications would be screened against Habitats Regulations protecting environmental designations through the determination of planning</p>	<p>No</p> <p>No</p> <p>No</p>

	applications.	
The effects on areas or landscapes which have a recognised national, Community or international protection status.	The NP Area includes designations which reflect the cultural and heritage value of the area such as listed buildings and conservation area. The environmental effects on areas of biodiversity designations have been considered through the emerging LP.	No



## 4.Screening Outcome

4.1.The assessment shown above identifies that based on the information available to date, there are unlikely to be any significant environmental effects from the implementation of the proposals in the emerging Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan.

4.2.The Environment Agency, Historic England and Natural England have responded to the Screening Opinion request and their responses are contained in Appendix 1. Their responses are based on the information provided by the Screening Opinion request dated 27th January 2017.

4.3.Having reviewed the criteria, Breckland District Council has concluded that the emerging NP is not likely to have any significant environmental effect and accordingly will not require a Strategic Environmental Assessment. The main reasons for this conclusion are:

- The NP does not allocate any sites for development.
- The NP seeks to avoid or minimise environmental effects when determining development proposals.
- The NP is unlikely to affect any designated sites in the vicinity or lead to other environmental effects.

4.4.This report is based on the Screening Opinion request of 27<sup>th</sup> January 2017 on the Informal Consultation Draft of the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan. Should the contents differ from that described in the Screening Opinion Request, there may be a requirement to revisit this Screening Opinion.

4.5.A copy of this report will be available for inspection at Breckland Council Offices, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

## APPENDIX 1 - Responses from Statutory Consultees

### APPENDIX 1

#### Responses from Statutory Consultees

**From:** Benn, Neville A [mailto:[neville.benn@environment-agency.gov.uk](mailto:neville.benn@environment-agency.gov.uk)]  
**Sent:** 30 January 2017 10:56  
**To:** Heinrich, Susan  
**Subject:** RE: Request for re-screening Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan

Dear Susan

We agree with your authorities conclusions that a SEA is not required.

Kind regards

**Neville Benn**

Senior Planning Advisor

Sustainable Places

East Anglia Area (West)

✉ Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE  
☎ Internal: 51906  
☎ External: 0203 0251906  
📧 [neville.benn@environment-agency.gov.uk](mailto:neville.benn@environment-agency.gov.uk)



# Croxton, Brettenham & Kilverstone Joint Neighbourhood Plan

## Consultation Statement January 2018

Date: 02 February 2017  
Our ref: 207280



Susan Heinrich  
Breckland Council  
Elizabeth House  
Walpole Loke  
Dereham  
NR19 1EE

Hombeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Susan Heinrich

### Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan

Thank you for your consultation on the above dated 27 January 2017 which was received by Natural England on 27 January 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

### Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance<sup>1</sup>. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Consultation Statement January 2018

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter only please contact Richard Sykes on 0300 060 3900. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk). We really value your feedback to help us improve the service we offer.

We have attached a feedback form to this letter and welcome any comments you might have about our service.


Yours sincerely

Richard Sykes  
Consultations Team

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# Croxton, Brettenham & Kilverstone Joint Neighbourhood Plan

## Consultation Statement January 2018



Historic England

EAST OF ENGLAND OFFICE

Ms Susan Heinrich  
Breckland Council  
Elizabeth House  
Walpole Lake  
Dereham  
Norfolk  
NR19 1EE

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Direct Dial: 01223 582747  
Our ref: PL00018556  
14 February 2017

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Dear Ms Heinrich


**Ref: Strategic Environmental Assessment (SEA) Screening Opinion for Croxton, Brettenham and Kilverstone Neighbourhood Plan consultation request**

Thank you for your email inviting Historic England to respond to the consultation on the SEA Screening Report for Croxton, Brettenham and Kilverstone Joint Neighbourhood 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 in your district and county councils.

Additional advice from Historic England you may find of use:

- HE Good Practice Advice in Planning 1 - the historic environment in local plans: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- HE Good Practice Advice in Planning 2 - managing significance in decision-taking in the historic environment: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>
- HE Good Practice Advice in Planning 3 - the setting of heritage assets: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
- HE Advice Note 1 - conservation area designation, appraisal and management: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>
- HE Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment->



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 3BU  
Telephone: 01223 582740  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



Stonewall  
DIVERSITY CHAMPIONS

Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Consultation Statement January 2018



Historic England

EAST-OF-ENGLAND-OFFICE

¶

and-site-allocations-in-local-plans¶

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HE-Advice-Note-7--Local-Listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>¶

¶

HE-Advice-Note-8--Sustainability Appraisal and Strategic Environmental Assessment: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>¶

¶

If you have specific questions which cannot be answered by your local conservation and archaeological specialists, please contact the Historic Places Team who can be reached on 01223 582749.¶

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Yours sincerely,¶

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24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU¶

Telephone: 01223 582740¶

[HistoricEngland.org.uk](https://www.historicengland.org.uk/)¶



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.¶

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Please note: Reference was made in the email sent in relation to this re-screening request, to the previous SEA screening on 16.04.16 where it took the view that an SEA would not be required.

## **Appendix N – Press Notice for Regulation 14 Consultation – August-September 2017**

### **PRESS RELEASE**

#### **Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan**

##### **Pre-Submission Consultation [For local websites, newspapers and newsletters]**

The Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (JNP) Steering Group is pleased to invite the community to review the first draft of the Joint Neighbourhood Plan. The Steering Group comprises the two Parish Councils of Croxton PC and Brettenham and Kilverstone PC.

The first draft of the Joint Neighbourhood Plan is the culmination of around three years of hard work and the dedication and input of volunteers and community representatives.

At the heart of the plan are fourteen draft policies focusing on ways in which the physical environment, the economy and the social life of Croxton and Brettenham & Kilverstone might be strengthened.

The policies contained within the draft Plan reflect community feedback from a 12 page Questionnaire to all residents, consultation events, and independent research. However, the policies are not final and the Steering Group is keen for local residents and businesses to review and provide feedback.

The consultation period will run from the **11<sup>th</sup> of August to the 29<sup>th</sup> Sept 2017**. Regulations require the document to be consulted on for at least six weeks, and all comments received will also be available for public review. The documents will be available online, and in hard copy for review at the locations listed below, from the 11<sup>th</sup> August 2017.

- Breckland Council Offices, Elizabeth House, Walpole Loke, Dereham
- Thetford Public library, Raymond Street, Thetford
- Telephone kiosk, Croxton
- Kilverstone Estate Office, Kilverstone
- Farm Office, Brettenham Manor

Response forms will be available at each of these locations with information on how to submit them.

It is vital that the Joint Neighbourhood Plan reflects the views and aspirations of the local community, and we encourage you to comment and be involved.

The Draft Joint Neighbourhood Plan and Character Appraisal documents can be found online at:

<http://c-bandkjointplan.norfolkparishes.gov.uk/>  
<http://croxtonpc.norfolkparishes.gov.uk/>  
<http://brettenham-and-kilverstonepc.norfolkparishes.gov.uk/>

and comments can be made to either:

[croxtonparish@gmail.com](mailto:croxtonparish@gmail.com) or [clerk@brettenhamandkilverstonepc.co.uk](mailto:clerk@brettenhamandkilverstonepc.co.uk)

or to contact details on the Response forms available at the above locations, and for Brettenham and Kilverstone, to the boxes provided at each Council notice board.

**-Press Release Ends-**



## **Appendix O – Media Coverage of Regulation 14 Consultation – August- September 2017**

EDP 6<sup>th</sup> September 2017

### **news**

#### **Three years work culminates in joint neighbourhood plan, strengthening the environment and economy**

**Three communities are being invited to review the first draft of a joint neighbourhood plan.**

The Croxton and Brettenham and Kilverstone Joint Neighbour Plan Steering Group is the culmination of

three years work.

At the heart of the plan are fourteen draft policies focusing on ways in which the environment, economy and social life of the three parishes can be strengthened.

The policies reflect feedback from a questionnaire

sent to all residents in addition to consultation events and independent research.

However the steering group, which comprises of Croxton Parish Council and Brettenham and Kilverstone Parish Council, is keen for

residents and businesses to review and provide feedback.

The consultation period will run until September 29.

Hard copies of the plan are available from Breckland Council offices, Dereham, Thetford Library or on the parish councils' websites.



## news

### Residents asked to review

**Three communities are being invited to review the first draft of a joint neighbourhood plan.**

The Croxton and Brettenham and Kilverstone Joint Neighbour Plan Steering Group is the culmination of three years work.

At the heart of the plan are fourteen draft policies focusing on ways in which the environment, economy and social life of the three parishes can be strengthened.

The policies reflect feedback from a questionnaire sent to all residents in addition to consultation events and independent research.

However the steering group, which comprises of Croxton Parish Council and Brettenham and Kilverstone Parish Council, is keen for residents and businesses to review and provide feedback.

The consultation period will run until September 29.

Hard copies of the plan are available from Breckland Council offices, Dereham, Thetford Library or on the parish councils' websites.



**Thetford & Brandon Times**

**September 6 2017-09-07**

**Page 21**

**Appendix P – Regulation 14 Consultation – Flyer**

**CROXTON and BRETTEHAM & KILVERSTONE  
JOINT NEIGHBOURHOOD PLAN**

**Pre-Submission Consultation  
will run for 7 weeks from 11 August to 29 September**

The Croxton and Brettenham & Kilverstone Parish Councils present the formal draft of the Joint Neighbourhood Plan. The Plan comprises 2 documents which can be found at:

[http://c-bandkjntplan.norfolkparishes.gov.uk/  
croxtonpc.norfolkparishes.gov.uk/  
brettenham-and-kilverstonepc.norfolkparishes.gov.uk/](http://c-bandkjntplan.norfolkparishes.gov.uk/croxtonpc.norfolkparishes.gov.uk/brettenham-and-kilverstonepc.norfolkparishes.gov.uk/)



Hard copy documents can be at the following locations:

- Breckland Council Offices, Elizabeth House Walpole Loke, Dereham
- Thetford Public library, Raymond Street, Thetford
- Telephone kiosk, Croxton
- Kilverstone Estate Office, Kilverstone
- Farm Office, Brettenham Manor

**Comments can be made to either:**

[croxtonparish@gmail.com](mailto:croxtonparish@gmail.com) or  
[clerk@brettenhamandkilverstonepc.co.uk](mailto:clerk@brettenhamandkilverstonepc.co.uk)

or in writing, delivered either to the above locations, or for Brettenham and Kilverstone, in the boxes at each of the PC notice boards.

## **Appendix Q – Regulation 14 – Consultation Email**

### **Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan**

#### **Pre-Submission Consultation**

The Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (JNP) Steering Group comprising the two Parish Councils of Croxton and Brettenham & Kilverstone, is pleased to invite the community to review the first formal draft of the Joint Neighbourhood Plan. The JNP consists of 2 documents, the Joint Neighbourhood Plan **(CD)** itself and the Character Appraisal **(CA)** which can be found at each of the following sites

<http://c-bandkjointplan.norfolkparishes.gov.uk/>

<http://croxtonpc.norfolkparishes.gov.uk/>

<http://brettenham-and-kilverstonepc.norfolkparishes.gov.uk/>

The formal JNP consultation period will run from the 11<sup>th</sup> of August **to 4.30 pm on 29<sup>th</sup> September** and all responses received will be available for public review. Comments can be made either to:

[croxtonparish@gmail.com](mailto:croxtonparish@gmail.com) or [clerk@brettenhamandkilverstonepc.co.uk](mailto:clerk@brettenhamandkilverstonepc.co.uk)

or in writing to:

Croxton Parish Clerk	Brettenham & Kilverstone Parish Clerk
Primrose Cottage	26 Arlington Way
29 Santon Downham	Thetford
Brandon	Norfolk
Suffolk	IP24 2DZ
IP27 OTQ	

Complete Response Forms may also be placed in the boxes at each Brettenham & Kilverstone Parish Council notice board, at Rushford, Brettenham, Kilverstone, and Arlington Way.

Bob King and Tony Poulter OBE

Joint Chairmen

Croxton and Brettenham & Kilverstone Parish Councils

Joint Neighbourhood Plan Development

[www.c-bandkjointplan.norfolkparishes.gov.uk](http://www.c-bandkjointplan.norfolkparishes.gov.uk)

**Appendix R – Regulation 14 Consultation – Response Tables JNP**

	<b><u>POLICY/PARA NO.</u></b>	<b><u>Reference No</u></b>	<b><u>Name of Respondent</u></b>	<b><u>Summary of Representation</u></b>	<b><u>PC Suggested Response</u></b>	<b><u>Action</u></b>
<b>1</b>	<b>General</b>	<b>REG 14/002/FISHER-001</b>	<b>Kay Fisher</b>	Impressed with the hard work that has gone into the document which demonstrates how much both villages value their surroundings.	Comments welcomed	No change to Plan
<b>2</b>	<b>General</b>	<b>REG14/005/NCC/001</b>	<b>Norfolk County Council</b>	The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.	Comments welcomed	No change to Plan
<b>3</b>	<b>General</b>	<b>REG14/005/NCC/011</b>	<b>Norfolk County Council</b>	The Historic Environment service would recommend the authors to include a direct reference to Historic England's published guidance on the preparation of Neighbourhood Plans.	Comments welcomed and suggested text to be included in the Preface	Amend Preface to refer to Historic England Guidance on Neighbourhood Plans
<b>4</b>	<b>General</b>	<b>REG14/008/HE/013</b>	<b>Historic England</b>	Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful in helping to identify what it is about	Reference to this guidance has been incorporated into the text of the JNP and the Character Appraisal. See REG14/005/NCC/0	See above

				<p>your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found here:</p> <p><a href="http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p>	11 above	
5	General	REG14/008/HE/014	Historic England	<p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets:  <a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-</a></p>	Comments noted. Reference to both will be made in the JNP as a new Appendix	New Appendix D "Other Useful Guidance" created.

				<p><u>note-2/&gt;</u></p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets:  <u>&lt;<a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf</a>&gt;</u></p>		
<b>6</b>	<b>General</b>	<b>REG14/006/BD C/001</b>	<b>Breckland Council</b>	Document Structure-welcome the further development of the document structure, particularly the replacement of bullet points in policies with either letters or numbers to aid referencing.	Comments welcomed	No change to Plan
<b>7</b>	<b>General</b>	<b>REG14/006/BD C/002</b>	<b>Breckland Council</b>	<p>Use of images- as previously advised, the plan would still benefit from including photographs of buildings and other structures around the villages, as well as charts, tables etc, where relevant.</p> <p>Particularly to supplement the</p>	The Character Appraisal includes a considerable number of original photographs and acts as evidence for the policies. It is considered this is the most	Appropriate photographs to illustrate policy enhancements have been inserted.



				vision section of the plan, show examples of what is meant by high design standards; important open spaces and views. In particular, to support the design policies JNP1, JNP3, JNP4	appropriate document for them. However, where the policies are referring to a specific enhancement then appropriate photographs have been included	
<b>8</b>	<b>General</b>	<b>REG14/008/HE/001</b>	<b>Historic England</b>	Thank you for consulting Historic England about your Neighbourhood Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the Croxton, Brettenham and Kilverstone Joint Neighbourhood Plan 2017-2036 document (JNP).	Support welcomed	No change to Plan

<b>9</b>	<b>General</b>	<b>REG14/008/HE/002</b>	<b>Historic England</b>	In general, we welcome this very comprehensive, well ordered and informative JNP document, which includes general reference to the history and character of the three parishes throughout, as well as paying attention to the area's character and historic environment. In particular, the preparation of the wide-ranging supporting Character Appraisal Statement that identifies individual character areas within the JNP area is welcomed as a useful evidence base for the policies within the plan, especially given the present absence of an up to date Conservation Area Appraisal and Management Plan for Croxtan.	Support welcomed	No change to Plan
<b>10</b>	<b>General</b>	<b>REG14/009/CWPC/001</b>	<b>Coney Weston Parish Council</b>	CWPC welcomes the aspiration of the Plan and endorses its content, particularly in relation to the hamlet of Rushford which co joins our parish. We support the policies relating to new design, the maintenance of open space both within and between settlements, the historic environment and to	Support welcomed	No change to Plan.

				maintain local distinctiveness.		
<b>11</b>	<b>General</b>	<b>REG14/006/BD C/003</b>	<b>Breckland Council</b>	<p>As previously advised, the plan still fails to fully recognise the significance of the SUE and its role and relation to the town of Thetford. Despite its physical position in the Parish of Croxton, Brettenham and Kilverstone, it is not necessarily appropriate to apply the same policies to the rural villages as to a large urban extension, which is highlighted in a number of the original comments. Furthermore, some of the policy restrictions are overly onerous, affecting viability and deliverability of development therefore not supporting sustainable development, as set out in the basic conditions</p>	<p>Following on from previous comments made prior to REG14, the Vision was recast to emphasize the rationale behind the plan i.e. integration between the rural area and the SUE (not the SUE and the town which is a role for the TAAP).</p> <p>Additional text was added at 3.3 to give context of the SUE as well as new text after 1.5.</p> <p>No specific evidence in relation to viability of new development has</p>	No change to Plan.

					<p>been supplied</p> <p>Some additional references to the background to the SUE and its relationship with the JNP have been added at 1.11 and 3.3 as a consequence of other representations</p>	
<b>12</b>	<b>General</b>	<b>REG14/006/BD C/004</b>	<b>Breckland Council</b>	As previously advised, justification (evidence) for all the policies is limited and still needs developing.	No consultees have highlighted the need for any specific additional evidence. The reasoned justification for each policy and the policy wording are reviewed at each stage and appropriate	Reasoned justification for each policy has been reviewed at each stage.

					changes made	
<b>13</b>	<b>Contents Page</b>	<b>REG14/006/BD C/005</b>	<b>Breckland Council</b>	Still not clear why the text needs to be this large?	The size of the font of the contents page is a matter for determination by the Parish Councils as authors, to review as they see fit. It has no impact on the soundness of the plan. However, if reducing font size aids reader then it can be reduced	Font size amended.
<b>14</b>	<b>General</b>	<b>REG14/007/NE /001</b>	<b>Natural England</b>	Natural England welcomes many of the policies within this plan, particularly those policies on protecting designated sites and local landscape character and enhancing ecological networks.	Comments welcomed	No change to Plan
<b>15</b>	<b>General</b>	<b>REG14/007/NE /002</b>	<b>Natural England</b>	We consider that the points on the environment would be	Agree that currently the	New policy on Natural

				better placed within an actual policy on the Environment rather than included in several policies as is currently the case. This policy could include all the information on the Breckland SPA and other relevant designated sites as well as policies on ecological connectivity and biodiversity gain.	environmental aspects are dispersed throughout the plan and that given their level of importance in the Neighbourhood Plan area it would make sense to have one policy that clearly covers all aspects.	Environment included as new JNP6
<b>16</b>	<b>General</b>	<b>REG14/007/NE/003</b>	<b>Natural England</b>	It would be useful to have a description of the designated sites and the ecology of the area in the background section	Agree, given the level of importance of protected sites in the Neighbourhood Plan area	Insert new wording on the designated sites and ecology of the area in new paras 2.3-2.6
<b>17</b>	<b>Para 2.25</b>	<b>REG14/005/NCC/005</b>	<b>Norfolk County Council</b>	Paragraph 2.25 (page 17) requires some clarity. The strategic urban extension (SUE) will provide an expansion of the existing secondary	Agree clarification is required. Amend Plan accordingly.	Amend wording of original Para 2.25 – now 2.28 to use the same wording

				school and not a new secondary school as referred to in paragraph 2.25. Therefore, the wording used in paragraph 4.20 (page 38) bullet point 4 should be used in paragraph 2.25.		as that in para 4.20
<b>18</b>	<b>Maps</b>	<b>REG14/005/B DC/007</b>	<b>Breckland Council</b>	As previously advised, the north compass rose is still missing from maps 2-5, as well as the scale. Also, it would be useful to locate the maps near to the text where they apply.	Mapping has been reviewed and comments taken on board.	Maps have been reviewed.
<b>19</b>	<b>Map 1</b>	<b>REG14/005/B DC/008</b>	<b>Breckland Council</b>	As previously advised, it would be useful if the key made it clear where the SUE was originally designated.	See comments above relating to maps	See above
<b>20</b>	<b>Maps2-5</b>	<b>REG14/005/B DC/009</b>	<b>Breckland Council</b>	The compass Rose and scale are missing from all these maps.	See comments above relating to maps	See above
<b>21</b>	<b>Maps2</b>	<b>REG14/005/B DC/010</b>	<b>Breckland Council</b>	It is not clear why the SUE is in purple on this map and mustard on all the others.	See comments above relating to Maps	See above
<b>22</b>	<b>Map 4 Croxton</b>	<b>REG14/005/B DC/011</b>	<b>Breckland Council</b>	As previously advised, it is not clear why there is a settlement	At the time of writing the REG 14	This issue will be reviewed at each

	<b>Settlement Boundary</b>			boundary map for Croxton.	JNP, the adopted Development Plan for Croxton contained a settlement boundary for the village. This is still the case although the Parish Council is aware that the most recent iteration of the Local Plan seeks to remove it. However, until the new Local Plan is adopted the settlement boundary is still in existence. The JNP will attempt to reflect the latest situation for the Settlement boundary at each stage	stage of the JNP.
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23	General	REG14/008/HE/003	Historic England	We therefore welcome the identification of the Croxton Conservation Area and the listed buildings within it on the map provided in Section 1 of the plan, as well as the maps accompanying each of the character areas identified by the Character Appraisal, which also indicate the other heritage assets present in each area. The only suggestion we would make would be, if possible, to modify the maps slightly to indicate what grade of designation the listed buildings were (Grade I/II* or II) as part of the colour coding.	Support welcomed. Agreed it useful to have a map showing the specific designations and grades. This could be incorporated into the Character Area Maps	Amend character area maps to show all heritage assets – designated and non-designated
24	Page 12, Croxton Settlement Boundary	REG14/006/BDC/012	Breckland Council	As previously advised, this states it is ' <i>not proposed ... to identify, remove, amend or alter the settlement boundary</i> '. This not consistent with including a map of the settlement boundary of Croxton and this inclusion will alter the boundary as the emerging Local Plan proposes to remove it.	See above in respect of comments relating to the emerging Local Plan.  BDC rep REG14/005/BDC/011	No change to Plan but keep issue under review for subsequent versions.

					<p>The map is included at the beginning of the plan and gives some context to the past status that Croxton has had in the planning hierarchy. It is purely for context and in no way proports to promote or allocate a Settlement Boundary for Croxton – in the same way that the inclusion of environmental information does not infer that the JNP is allocating an SPA. Once the emerging Local Plan is adopted</p>	
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					then the subsequent version of the JNP will respond accordingly.	
<b>25</b>	<b>Page 15 para 2.14</b>	<b>REG14/010/TTC/001</b>	<b>Thetford Town Council</b>	Arlington Way is separated by the River Thet not the Little Ouse	Arlington Way has the River Ouse to the South and the Thet to the north	Paragraph 2.18 (formerly 2.14) has been amended to clarify
<b>26</b>	<b>Page 15 Para 2.15</b>	<b>REG14/006/B DC/013</b>	<b>Breckland Council</b>	The explanation of what “The Brecks” are which is now in policy JNP3 would be better placed here rather than in the policy.	Agree some explanation is required however it may be best placed at 2.2. as it will relate to all 3 parishes.	Insert new explanatory text about the Brecks at 2.2.
<b>27</b>	<b>Page 16 para 2.18</b>	<b>REG14/010/TT C/002</b>	<b>Thetford Town Council</b>	The parish map clearly shows that Tesco Supermarket and Thetford Garden Centre are both in Thetford and so do not form part of the JNP	Agree to amend	Wording of 2.28 amended accordingly.

<b>28</b>	<b>2.27 Page 17</b>	<b>REG 14 /001/CLAYDON - 002</b>	<b>Leah Claydon</b>	<p>Refers to “little identifiable industry”</p> <p>There are several commercial businesses run from homes in Croxton including a jeweller’s, medical device business and Dave’s emporium to name but a few.</p>	<p>Original Paragraph 2.28 (now 2.32) refers to Dave’s emporium and one other business. It is difficult to fully quantify all business activity in a village especially if much of it is low key and carried out at home.</p> <p>However, Para 2.28 could be extended to refer the fact that there are other businesses being run from homes.</p>	Amend wording of Para 2.32
<b>29</b>	<b>2.21</b>	<b>REG14/ 001/CLAYDON - 001</b>	<b>Leah Claydon</b>	<p>Refers to line” no longer available”</p> <p>Implies won’t be available in the future when the village has not yet decided on the future of the PO/Shop and there is a real chance</p>	<p>The Parish Council understands that the previous occupier has retired and vacated the premises. The</p>	No change to Plan.

				of the shop/PO closing	<p>premises require extensive refurbishment before they would be suitable for any other use for which funding has not been identified. Some interest has been expressed in</p> <p>running the PO but little progress has been made. It is therefore likely to be some time before the appropriate Authority determines whether the PO is likely to be re-established. Therefore, the current wording in the plan is still appropriate and will be reviewed</p>	
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					before the Plan is submitted to reflect the current position at the time of writing.	
<b>30</b>	<b>Page 17 para 2.29</b>	<b>REG14/010/TT C/003</b>	<b>Thetford Town Council</b>	The HQ of STANTA is West Toffs Camp not Bodney Camp	Comments noted. Agree to correct the error	New wording in Paragraph 2.32 to refer to West Tofts
<b>31</b>	<b>Page 18 para 2.33</b>	<b>REG14/010/TT C/004</b>	<b>Thetford Town Council</b>	Tesco's Supermarket and Thetford Garden Centre are not in the village but are located in the town of Thetford	See response to REG14/010/TTC/00 2 above	See above
<b>32</b>	<b>Page 19 para 2.40</b>	<b>REG14/010/TT C/005</b>	<b>Thetford Town Council</b>	As plan references the railway station they should be pressing for additional parking to cope with the increase in use from the residents of the Sustainable Urban Extension (SUE) as stated in the retained TH7	Whilst it is appreciated this is a concern for many parties. The potential solutions lie outside of the	No change to Plan

				document	JNP area and therefore it is not appropriate for the JNP to contain a policy that relates to land outside of the JNP area as the JNP cannot require them to come forward. However, through the Greater Thetford Development Partnership (GTDP) the Parish Councils can seek to press for a solution.	
<b>33</b>	<b>Page 20,</b>	<b>REG14/006/BD C/006</b>	<b>Breckland Council</b>	Whilst it is welcomed that the SUE is now referred to in para 1.6 - 1.10, it could be beneficial to add more detailed context for Thetford SUE, maybe as an individual section drawing on the work which has already been established-TAAP and planning application, due to the significance	Additional context for the SUE has already been included in paras 1.6-1.10. It is unclear precisely what is being asked for here and what value it would add to the JNP policies	Amended wording at 1.11.

				<p>of the SUE in forming the key housing growth for Thetford and the parishes.</p>	<p>without repeating what has already been said in other documents. E.g. the TAAP.</p> <p>Some additional wording in respect of the relationship between the TAAP and the SUE policies is to be added at 1.11</p>	
<b>34</b>	<b>Section 3 – A Vision for the Parishes</b>	<b>REG14/005/N CC/002</b>	<b>Norfolk County Council</b>	<p>The County Council supports the Vision, Aims and Objectives set out in the Plan (pages 21 to 23). In particular the County Council supports reference to ensuring key infrastructure such as schools and health facilities are retained or improved. Support is also given to the aims and objectives relating to</p>	<p>Comments welcomed</p>	<p>No change to Plan</p>



				the environment; and economy.		
<b>35</b>	<b>Page 22 Vision</b>	<b>REG14/006/B DC/014</b>	<b>Breckland Council</b>	Redraft the vision in the light of further consideration of the connection between the urban extension, Thetford and the rest of the parish.	Agree that more emphasis could be given in the text and the vision to creating a transition between urban and rural character.	New wording added in respect of transition at para 3.3 and in the Vision
<b>36</b>	<b>Page 22 Objectives Housing 2<sup>nd</sup> point</b>	<b>REG14/006/B DC/015</b>	<b>Breckland Council</b>	Plan should define in text what the local vernacular is.	Agree that some definition of local vernacular (which is defined in the CA) could be included in the reasoned justification for Policy JNP1 rather than in the objectives.	Include additional text on defining vernacular in reasoned justification for JNP1
<b>37</b>	<b>Page 22 Objectives  Environment 1<sup>st</sup> and</b>	<b>REG14/008/HE /004</b>	<b>Historic England</b>	We welcome the inclusion, in Section 3: A Vision for the Parishes, of specific mention of preserving and enhancing the heritage of the JNP area, including built heritage and the setting of locally important	Agree suggested wording.	Amend 1st and 2 <sup>nd</sup> bullet points as suggested by Historic England.

	2 <sup>nd</sup> point			<p>heritage assets. We would suggest, however, the following slight amendment to the wording of the following sentences under the 'Environment' section, in order to ensure the JNP uses current terminology:</p> <p><i>"To conserve and enhance existing open spaces, important views, <b>the built and historic environment</b> and wildlife areas throughout the <b>neighbourhood plan area</b>"</i></p> <p><i>"To conserve and where possible enhance local distinctiveness in the <b>historic and natural environments...</b>"</i></p>		
38	Page 22 Objectives Environment 4 <sup>th</sup> and 5 <sup>th</sup> point	REG14/006/B DC/016	Breckland Council	Change word "protect to preserve".	The choice of individual wording is a matter for the authors of the plan in this case the Parish Councils.	No change to Plan. Wording amended because of other representations

					<p>Neither word would render the Plan unjustifiable. Dictionary definitions:</p> <p>Protect – keep safe from harm and injury</p> <p>Preserve – maintain in its original or existing state</p> <p>in this context, the use of the word preserve would seem to imply less change was permissible.</p> <p>Historic England have suggested some alternative wording and the Plan will be amended to reflect</p>	
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					the Historic England request.  See REG14/008/HE/004 above.	
<b>39</b>	<b>Page 22 Objectives</b>  <b>Environment 3<sup>rd</sup> point</b>	<b>REG14/006/B DC/017</b>	<b>Breckland Council</b>	Text required to define why the “break” between Croxton village and the A11 is important.	Agree that more detail on the “Strategic Gaps” is required. Add additional text in the reasoned justification of the “Strategic Gaps” policy. Policy is to be renamed.	Additional text in reasoned justification for Policy JNP11
<b>40</b>	<b>Page 22 Objectives</b>  <b>Environment 4th point</b>	<b>REG14/006/B DC/018</b>	<b>Breckland Council</b>	Suggest inclusion of the words “preserve and enhance”	See comments above in respect of the word “preserve”. Agree insertion of “enhance”	Insert “and enhance” in bullet point 4.
<b>41</b>	<b>Page 22</b>	<b>REG14/010/TT C/006</b>	<b>Thetford Town Council</b>	This plan should aim to improve cycle links to the town of Thetford as this is the centre that provides a lot of their services.	Brettenham and Kilverstone PC has already installed a cycle and wheel chair friendly path	Additional objective added to page 25.

				Enhance green route in Thetford by improving the pathway along the River Thet	in conjunction with TTC from Arlington Way to Nuns Bridges  An additional objective in respect of cycling and linking up with the Thetford loops has been included	
42	Infrastructure	REG 14/002/FISHER-002	Kay Fisher	All businesses need a viable and fast internet connection. It is also a fact that much entertainment and fact finding and even shopping is only available via an internet connection now. Thus, similar to transport networks (roads) provided and maintained by a precept – could this be applied to internet provision.	Norfolk County Council have a project “Better Broad Band for Norfolk”  <a href="http://www.betterbroadbandnorfolk.co.uk/faqs/">http://www.betterbroadbandnorfolk.co.uk/faqs/</a>  which aims to make available superfast broadband (24 Megabits per	Insert new paragraph after 4.21 to refer to the importance of high speed broadband as an infrastructure consideration

					<p>second and above) available to as much of Norfolk as possible with the funding available and enabling basic broadband (2Mbps+) as a minimum, right across Norfolk, so that everyone who wants access to broadband can have it. Rushford for example is having cables laid currently and Croxton was one of the first villages to receive the service.</p>	
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<b>43</b>	<b>Infrastructure</b>	<b>REG 14/ 004/CLH  PIPELINE - 001</b>	<b>CLH Pipeline System Ltd</b>	Plan of pipeline apparatus supplied.	Plan noted	No change to Plan
<b>44</b>	<b>Page 26 JNP1  Design and Materials</b>	<b>REG14/006/B DC/019</b>	<b>Breckland Council</b>	Reconsider creating separate design policy for the SUE from the rest of the Parish.	As previously advised do not agree. This undermines the purpose and rationale for the JNP. The rationale behind the plan i.e. integration between the rural area and the SUE (not the SUE and the town which is a role for the TAAP).  The TAAP already sets design principles for the SUE (TH20) and the outline planning application supporting	No change to Plan

					information sets the design context. The emerging Breckland Local Plan proposes to roll Policy TH20 forward thereby underlining its relevance. It is difficult to see what more a separate design policy for the SUE would expand upon that isn't already covered within this policy or the Masterplan for the site.	
45	JNP1	REG14/008/HE/005	Historic England	We also welcome policy JNP1, dealing with the design of new housing and the use of materials. The use of the Character Appraisal Statement as an evidence base to	Support for policy welcomed.	No change to Plan



				underpin this policy and others is, as noted above, considered a useful and comprehensive approach.		
46	JNP1 Housing Design & Materials4 9	REG14/010/TT C/009	Thetford Town Council	<p>Notwithstanding that they may be a desire to develop a policy that pertains to the historic village cores (HVC) the retained document TH20 Vision for the Thetford Urban Extension deals with this.</p> <p>This NP as a lower tier document should not conflict with TH20</p>	<p>The rationale for the JNP is about integration not just of built development but of communities (people).</p> <p>This policy relates both to the SUE and to the area outside of it. It is not in conflict with Policy TH20 and is aimed at adding value to it. See also BDC reps requiring specific design policy for the SUE.</p> <p>See REG14/006/BDC/019 above.</p>	No change to Plan

<b>47</b>	<b>Page 26 JNP1  Design and Materials</b>	<b>REG14/006/B DC/020</b>	<b>Breckland Council</b>	Policy is too long for day to day use by officers. Combine para1 2 and 4 in the same paragraph.	Policy wording has been reviewed, as a consequence of this, and other representations and is now shorter	Policy has been reworded.
<b>48</b>	<b>JNP1 1<sup>st</sup> para 2<sup>nd</sup> sentence</b>	<b>REG14/006/B DC/021</b>	<b>Breckland Council</b>	What is “cultural history”? Replace with heritage.	Policy wording has been reviewed, as a consequence of this, and other representations	Policy has been reworded.
<b>49</b>	<b>JNP1 2<sup>nd</sup> para</b>	<b>REG14/006/B DC/02</b>	<b>Breckland Council</b>	Reasoned justification should provide more detail on local vernacular	Agreed. See response to REG14/006/BDC/01 5 above	New text has been added in the reasoned justification paras 4.7-4.10
<b>50</b>	<b>JNP1 2<sup>nd</sup> para</b>	<b>REG14/006/B DC/023</b>	<b>Breckland Council</b>	Provide the evidence outlined or replace “in the parish” with “of the relevant settlement”	Agree.	Use suggested wording.
<b>51</b>	<b>JNP1 3rd para</b>	<b>REG14/006/B DC/024</b>	<b>Breckland Council</b>	Define the type of protected sites being referred to.	Policy has been reworded, as a consequence of other representations and a separate policy relating to	Policy reworded, as a consequence of other representations

					the ecology and natural environment will be added.	
<b>52</b>	<b>JNP1 criterion b</b>	<b>REG14/006/B DC/025</b>	<b>Breckland Council</b>	Overly onerous requiring residents being able to access rear gardens by other means than through the house. Remove criterion b)	Do not agree this is overly onerous. It is about good design solutions which should be promoted. It has been used successfully in other Neighbourhood Plans. . e.g. Yaxham	No change to Plan
<b>53</b>	<b>JNP1 criterion c</b>	<b>REG14/006/B DC/026</b>	<b>Breckland Council</b>	<p>Unless specific evidence is available suggest the criterion be reworded:</p> <p>“Each new residential plot should also have regard to the need to provide for any necessary vehicular parking, ancillary storage and refuse and recycling”</p> <p>Highways Authority already have standards for garages.</p>	Agree to reword as suggested.	Reword criterion c as follows: “Each new residential plot should also have regard to the need to provide for any necessary vehicular parking, ancillary storage and refuse and recycling”

<b>54</b>	<b>JNP1 criterion e</b>	<b>REG14/006/B DC/027</b>	<b>Breckland Council</b>	<p>This approach risks the retention of low value trees and hedgerows.</p> <p>Suggest rewording:</p> <p>“where possible existing natural features such as trees of high and moderate quality with identifiable aboricultural, landscape or cultural values as well as important ...”</p>	<p>The suggested wording is at odds with previous comments from BDC about onerous requirements and lack of clarity. What is a tree of moderate quality and how is it defined? What also is the harm of retaining trees and hedgerows that may not be of high quality?</p> <p>This criterion is to be removed and incorporated in a separate ecology and Natural Environment Policy</p>	<p>Criterion e deleted from JNP and moved to new and Natural Environment Policy</p>

55	Para 4.3 (JNP1)	REG14/005/N CC/006	Norfolk County Council	<p>This Neighbourhood Plan despite reference to a drainage issue in The Street, Croxton (page 27, paragraph 4.3), does not discuss flood risk, or set a policy for surface water drainage for new developments. Therefore, the County Council considers that a flooding policy should be included in the Plan, the following policy is advised;</p> <p>“INTENTION</p> <p>The Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Plan 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.</p>	<p>Agree that this is an important issue that often appears to be considered at too late a stage.</p> <p>The proposed wording is very similar to that of Proposed Policy ENV09 of the Emerging Breckland Local Plan which is likely to be adopted in advance of this JNP.</p> <p>Policies in the JNP should seek to add to existing development plan policies rather than repeat them</p>	Include new policy on surface water drainage and flooding as new Policy JNP10

				<p>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.</p> <p>Any new development or significant alteration to an existing building within the Plan 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:</p> <ul style="list-style-type: none"> <li>• Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.</li> </ul>	<p>however it is an important issue that can generate strong feeling locally and therefore</p> <p>Happy to include the new policy to satisfy any NCC concerns.</p>	
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				<ul style="list-style-type: none"> <li>• Have a neutral or positive impact on surface water drainage.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <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 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</li> </ul>		
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				<p>an appropriate discharge location.</p> <ul style="list-style-type: none"> <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>		
56	JNP1	REG14/011/Dawson/001	Mr David Dawson	Any new houses should have enough parking for multiple cars, seeing that most couples/families will have 2 or more cars, depending on whether their offspring drive as	Comments noted. An aspiration of the JNP is to ensure that realistic	No change to Plan



				well.	provision is made to prevent the appearance of new development being marred by ad hoc parking	
<b>57</b>	<b>P28 JNP2 Housing Density 1<sup>st</sup> para</b>	<b>REG14/006/B DC/028</b>	<b>Breckland Council</b>	The policy or supporting text should list the density information referred to in the policy, or make specific reference to the part of the Character Appraisal that deals with the issue of density.	Agree that the policy wording needs reviewing. Noted this response is the complete opposite of the TTC representation.	Policy wording has been amended as a consequence of other representations
<b>58</b>	<b>JNP2 Housing Density</b>	<b>REG14/010/TT C/010</b>	<b>Thetford Town Council</b>	This plan should confine itself to the HVC's as overall housing density for the SUE is covered by the outline planning permission and the associated masterplan.	This is the complete opposite to the BDC representation which is seeking more detail.  See REG14/006/BDC/028 above	See above
<b>59</b>	<b>P28 JNP2 Housing</b>	<b>REG14/006/B</b>	<b>Breckland Council</b>	Ecology doesn't fit in this policy.	See response to Natural England	See above

	<b>Density 3rd para</b>	<b>DC/029</b>		Consider a new policy for ecology	Comment REG14/007/NE/002 above	
<b>60</b>	<b>P29 JNP3 Enhancing Village gateways</b>	<b>REG14/006/B DC/030</b>	<b>Breckland Council</b>	Move clarification of the “Brecks area” to the text at 2.15.	See response to REG14/006/BDC/0 13.  It is helpful to have examples of Brecks habitat in the policy.	See above
<b>61</b>	<b>P29 JNP3 3<sup>rd</sup> para</b>	<b>REG14/006/B DC/031</b>	<b>Breckland Council</b>	Consider identifying key gateway sites on a map	Agree these could usefully be shown on the map	New map to show key gateways
<b>62</b>	<b>P29 JNP3 4th para</b>	<b>REG14/006/B DC/032</b>	<b>Breckland Council</b>	Delete paragraph and refer to emerging District Local Plan in the supporting text.	This comment is contrary to other previous comments made by BDC about a need for an ecology policy.	See response to REG14/007/ NE/002 above

					This text will be removed from this policy and included within a separate policy for Natural Environment to be included as new JNP6	
63	P29 JNP3 4th para	REG14/006/B DC/033	Breckland Council	Delete “within vicinity”	Policy wording is to be revised  See response to Natural England REG14/007/NE/002 .	See above. Policy wording has been revised
64	JNP3	REG14/010/TT C/011	Thetford Town Council	No additional comments to those presented by Breckland Council	Noted. See response to BDC reps on JNP3	See BDC rep
65	P29 JNP3 para 5 and 6 ecology	REG14/006/B DC/034	Breckland Council	Ecology doesn’t really fit in the policy. Suggest creation of separate ecology policy	See response to Natural England REG14/007/NE/002 .	See above

<b>66</b>	<b>P29 JNP 3 6<sup>th</sup> para</b>	<b>REG14/006/B DC/035</b>	<b>Breckland Council</b>	Refers to unspecific government guidance on planning and biodiversity. If it is not possible to refer to specific guidance it is preferable to remove that part of the sentence	See response to Natural England REG14/007/NE/002 .  And the creation of a separate Natural Environment Policy	See above
<b>67</b>	<b>P31 JNP4 Integrating Developme nt</b>	<b>REG14/006/B DC/036</b>	<b>Breckland Council</b>	Welcome the requirement for affordable housing to be well integrated with market housing	Comments welcomed	No change to Plan
<b>68</b>	<b>P31 JNP4 Integrating Developme nt</b>	<b>REG14/006/B DC/037</b>	<b>Breckland Council</b>	Consider revising the policy to create a design policy for the SUE which reflects the role of the SUE as an urban extension to Thetford in addition to the relationship with the rest of the parish and incorporates mixed communities, inclusive design and community consultation	See response to REG14/006/BDC/019 above	See above
<b>69</b>	<b>P31 JNP4 Integrating Developme nt</b>	<b>REG14/006/B DC/038</b>	<b>Breckland Council</b>	Have one policy for the SUE – move relevant policy from JNP1 and JNP2 into this one	Policy has been recast to emphasize the need for a gradual	Policy wording has been amended as a consequence of other

					transition between urban Thetford and the rural parishes.	representations
<b>70</b>	<b>P31 JNP4 Integrating Development</b>	<b>REG14/006/B DC/039</b>	<b>Breckland Council</b>	It is unclear whether the issue of Designing out Crime has been considered.	Agree this needs clarification. Policy wording and supporting text has been amended to refer to this issue.	Policy wording amended to refer to Designing out Crime
<b>71</b>	<b>P31 JNP4 Integrating Development</b> <b>1<sup>st</sup> para</b>	<b>REG14/006/B DC/040</b>	<b>Breckland Council</b>	Amend end of sentence to read “and materials of the parish as identified in the relevant Character Appraisal Thetford”	This appears to go against the rationale of the JNP which is to integrate the SUE with the rural area – both built development and communities.  Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.	Policy wording has been amended as a consequence of other representations

<b>72</b>	<b>P31 JNP4 Integrating Developme nt  2nd para</b>	<b>REG14/006/B DC/041</b>	<b>Breckland Council</b>	Amend to “and where possible appropriate development of urban character should occur closer to the town <del>discouraged</del> ”	This appears to go against the rationale of the JNP which is to integrate the SUE with the rural area – both built development and communities.  Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.	Policy wording has been amended as a consequence of other representations
<b>73</b>	<b>P31 JNP4 Integrating Developme nt  5<sup>th</sup> para</b>	<b>REG14/006/B DC/042</b>	<b>Breckland Council</b>	Remove from policy and add to supporting text	Agreed.	Move text from policy to reasoned justification.
<b>74</b>	<b>JNP4 Integrating the SUE</b>	<b>REG14/010/TT C/012</b>	<b>Thetford Town Council</b>	Concur with BDC comments  Notwithstanding the HVC within the NP needs to address the design	Policy has been recast to emphasize the need for a gradual	Policy wording has been amended as a consequence of other

				<p>principles for arriving at the larger settlement of Thetford, a vision that embraces the visually larger houses</p> <p>Visually larger houses can be internally sub-divided to provide multiple individual dwellings consistent with other town dwellings on the original A11 corridor. All bin storage and parking should be located at the rear of the buildings and not on the primary frontage.</p>	transition between urban Thetford and the rural parishes.	representations
75	Historic Environment and Character (JNP5)	REG14/005/NCC/008	Norfolk County Council	The Historic Environment service commends the coverage on historic environment and heritage in the parishes; especially the heritage reference under the environment objective (page 22), policy JNP 5 (page 33) and policy JNP10 (page 43).	Comments welcomed	No change to Plan
76	JNP5 – Historic Environment	REG14/008/HE/006	Historic England	We particularly welcome Policy JNP5: Historic Environment and Character, and are pleased that it emphasises the need to preserve and enhance or protect the heritage assets in the JNP area. We suggest	Support Welcomed. Agree to the suggested wording and to replace undesigned with	Amend wording of JNP5 as set out in the HE representation.

				that the policy could be strengthened further with the following modification to the last sentence of the second paragraph <i>“The heritage statement should also clearly identify where harm to heritage significance has been avoided or minimised where possible through mitigation, and that unavoidable harm to significance is clearly and convincingly justified by the public benefits delivered by the proposed scheme”</i> . We also suggest that ‘non-designated’ is used instead of ‘undesigned’, in line with the terminology used in the National Planning Policy Framework (NPPF	non-designated in accordance with the NPPF	
<b>77</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/043</b>	<b>Breckland Council</b>	Replace “undesigned” with “non-designated”	See HE representation above.	Replace “undesigned” with “non-designated”
<b>78</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/044</b>	<b>Breckland Council</b>	Add important landscape features, or important views/village gateways.	This subject is covered by Policy JNP 3 and also new	No change to Plan.



	nt				Policy JNP6	
<b>79</b>	<b>P33 JNP5 Historic Environme nt</b>	<b>REG14/006/B DC/045</b>	<b>Breckland Council</b>	Requiring a statement goes beyond what is statutorily required.	It is beyond statutory requirements but is not unduly onerous and can easily be covered by a design and access statement which is a statutory requirement. (See also response to Historic England rep REG14/008/HE/006 above)	No change to Plan
<b>80</b>	<b>JNP5 Historic Environme nt</b>	<b>REG14/010/TT C/013</b>	<b>Thetford Town Council</b>	Within the SUE TH21 and TH23 already address these issues, so unless a more detailed vision (which we would welcome) this lower tiered document should not conflict with this.	Do not agree. The policy is applicable to all 3 parishes and also outside of the SUE and does provide appropriate guidance and is supported by other respondents	No change to Plan

<b>81</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/046</b>	<b>Breckland Council</b>	Include the list of designated and undesignated heritage assets in the Plan not the Character Appraisal	All heritage assets are listed as new Appendix B	Include new Appendix B identifying all Heritage Assets – designated and non-designated
<b>82</b>	<b>JNP 5 Historic Environment</b>	<b>REG14/008/HE /007</b>	<b>Historic England</b>	The government's National Planning Practice Guidance is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest or locally listed buildings. We are pleased to note, therefore, the inclusion of locally identified elements of the historic environment in the JNP, which the plan then aims to protect.	Support welcomed	No change to Plan

83	Para 4.16	REG14/006/B DC/047	Breckland Council	Replace “undesigned” with “non-designated”	See response to HE representation above.  REG14/008/HE/006 .	Replace “undesigned” with “non-designated”
84	Transport and Highways Safety (JNP 6)	REG 14/002/FISHE R-003	Kay Fisher	As Kilverstone is almost a suburb of Thetford, rural paths/pavements (similar to the path linking Arlington Way) should link the village to the Garden Centre, the Church and Thetford Tesco's and beyond. The Brettenham Road is becoming very dangerous with the amount of traffic and pedestrians using it.	Agree. Path has been added to list of projects under JNP.8 (formerly JNP7)	Include in text under JNP.8 (para 4.36)
85	Page 36 JNP6 Transport and Highway Safety 5 <sup>th</sup> para	REG14/006/B DC/048	Breckland Council	Suggest rewording to:  “New development should be designed to discourage speeding traffic and ensure that it avoids the risk of, creation of “rat runs” or and to adding to significant amounts of traffic movements or speeding on rural roads elsewhere in the parishes.	Agree. Incorporate new wording	Reword as follows:  “New development should be designed to discourage speeding traffic, creation of “rat runs” and to adding significant amounts

						of traffic movements on rural roads in the parishes.
86	Page 36 JNP6 Transport and Highway Safety 6 <sup>th</sup> para	REG14/006/B DC/049	Breckland Council	Add in thresholds. If there are specific routes which have problems, identify them and how issues prevented	Two specific routes are problematic in Brettenham and Kilverstone.  The C147 through Rushford where traffic surveys and some speed monitoring has taken place which shows a 10% increase in traffic volume and discussions are on-going in respect of solutions. The C148 Brettenham to	New wording has been inserted at Paragraph 4.27

					<p>Kilverstone Road has also seen an increase in traffic and speeds but this may be exacerbated currently by drainage works taking place in Bridgham which has resulted in a road closure. Therefore, it is not currently possible to obtain reliable data.</p> <p>In Croxton, "The Street" has been the subject of discussions re traffic calming measures to reduce speeds and it is anticipated that speed limit</p>	
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					flashing signs will be investigated subject to funding.	
87	Page 36 JNP6 Transport and Highway Safety 6 <sup>th</sup> para	REG14/006/B DC/050	Breckland Council	Add in thresholds. If there are specific routes which have problems, identify them and how issues prevented	See above	See above
88	Page 36 JNP6 Transport and Highway Safety 7 <sup>th</sup> para, 1 <sup>st</sup> sentence	REG14/006/B DC/051	Breckland Council	Replaced “avoid” with “manage”	Agree.	Replace “avoid” with “manage”
89	JNP6 Transport and Highway	REG14/010/TT C/014	Thetford Town Council	We welcome the reference to safe pedestrian footpaths and wherever possible, these should be combined with cycle paths	Comments noted. We would add in the requirement to be disability	No change to Plan

	<b>Safety</b>			Footpaths and cycle paths should be of a suitable capacity to deal with the flow of traffic once the SUE is complete	compliant.	
<b>90</b>	<b>Page 36 Para 4.19</b>	<b>REG14/010/TT C/007</b>	<b>Thetford Town Council</b>	A suitable cycle way to Thetford Academy is required to fit the needs of the residents of the SUE and surrounding villages.  Upgrade Joe Blunts Lane as referenced in retained TH12 The Thetford Loops	This issue is already covered by the TAAP in Policy TH12 and 11 which are proposed to be retained by Breckland Council. However, it could be mentioned in the supporting text.	Include new wording to refer to Joe Blunts Lane as a protected green route
<b>91</b>	<b>4.18</b>	<b>REG 14  /001/CLAYDON - 003</b>	<b>Leah Claydon</b>	Rat runs – Croxton would benefit from traffic calming measures such as a speed sign – LED type displaying speed/smiley face and possibly a single carriage passing give way gate(?) at either of the village to prevent excessive speeding on the high street.	See response to BDC above  REG14/006/BDC/049  In Croxton, “The Street” has been the subject of discussions re	See above.  REG14/006/BDC/049

					traffic calming measures to reduce speeds and it is anticipated that speed limit flashing signs will be investigated subject to funding	
92	Community facilities (JNP 7)	REG 14/002/FISHE R-004	Kay Fisher	Either in Kilverstone Village or very nearby there should be Health Centre/Drs surgery. It will be difficult for residents here to be allocated health provision as both surgeries in Thetford are oversubscribed.	<p>The PCs have sympathy with this comment.</p> <p>This is being considered by the GTDP Board and discussions taking place with the Norfolk Director of Public Health who should identify and quantify the need to support the 5,000 new homes and then ask NHS Midlands and East to provide it. There is land earmarked</p>	Amendments made to supporting text



					for this in the SUE outline application but only £178k in the S106 agreement. Neither of the PCs had the opportunity to input into the S106.	
93	4.20	REG 14/ 001/CLAYDON - 004	Leah Claydon	IMO – Primary Care Facilities are a priority and any development should not be permitted to commence without appropriate funding being in place for this.	See response to 002/FISHER/002 above.  The PCs have sympathy with this comment.  This is being considered by the GTDP Board and discussions taking place with the Norfolk Director of Public Health who should identify and quantify the need to support the	See above

					5,000 new homes and then ask NHS Midlands and East to provide it. There is land earmarked for this in the SUE outline application but only £178k in the S106 agreement. Neither of the PCs had the opportunity to input into the S106.	
<b>94</b>	<b>Community Facilities (JNP 7)</b>	<b>REG14/003/ Sport England -001</b>	<b>Sport England</b>	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging</p>	<p>Comments noted.</p> <p>Responses to the Questionnaire in 2015 highlighted sport facilities, playing fields and play areas as well as informal open spaces as being priorities for the</p>	No change to Plan

				<p>communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of</p>	<p>community in terms of new facilities.</p> <p>The permission granted for the outline on the SUE site does include Strategic Open Space and Local Open Space although there are no formal new facilities identified at this stage.</p> <p>In addition, a new policy has been added to protect Local Green Spaces (JNP14)</p> <p>Should additional funding or site based</p>	
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				<p>playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.</p> <p><a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with</p>	<p>opportunities arise, during the course of the Plan period, the Parish Councils will focus their efforts towards delivering these priorities in accordance with Local Plan policies and this guidance.</p>	
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				<p>Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning</p>		
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				<p>policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design</p>		
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				<p>guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>		
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				<p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering</p>		
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				<p>stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8:  <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section:  <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance:  <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>		
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<b>95</b>	<b>Community Facilities (JNP7)</b>	<b>REG14/005/N CC/003</b>	<b>Norfolk County Council</b>	The County Council supports POLICY JNP7: Community Facilities (pages 37 and 38) specifically the reference to housing and other developments contributing to local services and infrastructure through S106 agreements and/or CIL.	Comments noted	No change to Plan
<b>96</b>	<b>Community Facilities (JNP7)</b>	<b>REG14/005/N CC/004</b>	<b>Norfolk County Council</b>	<p>The neighbourhood plan should consider the following;</p> <p>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. The neighbourhood plan should therefore have policies referencing the delivery of the above infrastructure, which could be included on page 38.</p>	Agreed, this is a new issue emerging.	Amend Plan policy and supporting text to include reference to sprinklers in all new developments on page 38 Para 4.22.

97	P37 JNP7 Community /Existing Facilities	REG14/006/B DC/052	Breckland Council	Needs a definition in the text showing the range e.g. pub, shop etc	Agree. Insert additional text in 4.20 to outline what community facilities are.	Insert additional text at 4.20 defining community facilities
98	P37 JNP7 Community /Existing Facilities  1 <sup>st</sup> para criteria a b and c	REG14/006/B DC/053	Breckland Council	Delete criteria a b and c as it duplicated Policy COM in the adopted Plan	Do not agree. The issue of community facilities is the single most mentioned issue throughout consultations. By removing these criteria, the JNP would not have any reference to existing facilities and it is considered that this would undermine the value the community places on its existing facilities.	No change to Plan.
99	JNP 7 Community	REG14/008/HE /012	Historic England	As you are aware, based on the inclusion in the JNP of Policy JNP7,	Comments noted however there is	No Change to Plan

	<b>Facilities</b>			<p>communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their designated area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can have access to this money or influence how it is spent through the neighbourhood plan process. Historic England recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here:</p>	currently no CIL in force in the JNP area.	
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				<a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a>		
<b>100</b>	<b>New Facilities</b>	<b>REG14/006/B DC/054</b>	<b>Breckland Council</b>	Add in thresholds for securing obligations; refer to more detailed/considered list of new projects to be put forward or if no detail then updated project list to be appended and monitored every 6 months/year/2 years	Comments noted although the detail of specific projects is not yet known.  Additional wording to be included in the text	Include wording relating to project list within the supporting text.
<b>101</b>	<b>1<sup>st</sup> para</b>	<b>REG14/006/B DC/055</b>	<b>Breckland Council</b>	Suggest rewording to reflect CIL tests	Comments noted. See below	See below
<b>102</b>	<b>2<sup>nd</sup> para</b>	<b>REG14/006/B DC/056</b>	<b>Breckland Council</b>	Either delete or reword so where there are funds/contributions these shall be directed towards those priorities set out in the JNP or otherwise required by policies in the Local Plan	Agree this needs rewording along the lines suggested	Include additional text as suggested
<b>103</b>	<b>3<sup>rd</sup> para</b>	<b>REG14/006/B DC/057</b>	<b>Breckland Council</b>	Add to an amended SUE policy	This policy is to apply throughout the JNP area. Although most	No change to Plan

					development is planned to take place in the SUE, whilst there is a shortfall in 5-year land supply in the District then other applications for development may come forward that may either generate a need for additional facilities or contribute towards them. e.g.3PL/2017/0578 /O	
<b>104</b>	<b>JNP7 Community Facilities</b>	<b>REG14/010/TT C/015</b>	<b>Thetford Town Council</b>	This is referred to under retained TH23. Groups of farm buildings give ideal opportunity for redevelopment into community hubs and we are aware that interest exists for this. The NP should therefore be the source of vision for this.  We would have expected a detailed	Policy TH23 already identifies some of the existing farm buildings within the SUE area as “undesigned heritage assets of local interest” and supports the principle of them	No change to Plan

				vision of how existing buildings in SUE can be redeveloped to provide a historic hub. Something that worked very successfully in Moreton Hall near Bury St Edmunds	being re-used for community benefit. Given the TAAP policies and the outline permission it is unclear what additional policy guidance the JNP would be expected to provide.	
105	Page 39 JNP8 Employment	REG14/006/B DC/058	Breckland Council	Provide further detail in the policy wording. Consider outlining exceptions and defining significant employment sites	Policy doesn't refer to significant employment sites. Employment in this area is small scale.  Supporting text already identifies which sites are covered by the policy at 4.26	No change to policy
106	Page 39 JNP8 Employment	REG14/006/B DC/059	Breckland Council	"provided they do not have a significant adverse impact upon the character of the area or the amenity	Agree to amend wording consistent with preceding	Insert "have a significant adverse" before impact in

	t 2 <sup>nd</sup> para			of residents”	paragraph	the 2 <sup>nd</sup> paragraph.
107	JNP8 Employment	REG14/010/TT C/016	Thetford Town Council	<p>Thetford Garden Centre and Tesco's are in the town of Thetford and not Kilverstone.</p> <p>Amend</p> <p>There are areas of Kilverstone that are not in the SUE settlement boundary, but still provide an opportunity for employment in a historic environment, through the reuse of historic buildings</p>	<p>See response to REG14/010/TTC/002 above</p> <p>No specific areas are mentioned but the policy is intended to allow for new employment subject to certain criteria also with extensions to existing employment sites. Agree to add wording in respect of re-use of existing buildings.</p>	Add new wording to refer to the reuse of existing buildings.
108	P39 para 4.24	REG14/006/B DC/060	Breckland Council	Suggest that either here or on page 16 regarding Croxton that mention is made of the Thetford Enterprise	Agree.	Insert reference to Thetford Enterprise Park in para 4.24



				Park and its potential to provide significant local employment		
<b>109</b>	<b>P40 JNP 9 Strategic Gaps</b>	<b>REG14/006/B DC/061</b>	<b>Breckland Council</b>	Remove maps and references to it and change policy to “avoiding the coalescence of settlements”. The nearby SUE addresses the growth for Thetford so no additional pressure for further growth in the area within the plan period and new housing would be contrary to other policies for the vast majority of the designated areas	Agree that more rationale needs to be included in the supporting text however, do not agree with points about no pressure for additional growth when there is a current application in Brettenham 3PL/2017/0578/O that is proposing 115 new units and is outside of the SUE and ironically may be recommended for approval. The lack of a 5-year land supply in Breckland means that there remains additional pressure for	Policy has been renamed “Avoiding the coalescence of settlements” and further text added to the reasoned justification

					growth in the area.	
<b>110</b>	<b>P40 JNP 9 Strategic Gaps</b>	<b>REG14/006/B DC/062</b>	<b>Breckland Council</b>	If the map is to be retained there must be clear evidence. Also have a much narrower strip combining the two areas	Agree the text needs strengthening however there is a clear justification and a clear threat of unplanned growth in the area due to a lack of a 5year land supply	See above
<b>111</b>	<b>JNP 9 3<sup>rd</sup> para 1<sup>st</sup> sentence</b>	<b>REG14/006/B DC/063</b>	<b>Breckland Council</b>	Remover and amend text regarding the objective	Agree remove from policy and insert into reasoned justification at 4.26	Remove text from policy and insert in para 4.26.
<b>112</b>	<b>Page 41 Reasoned Justification</b>	<b>REG14/006/B DC/064</b>	<b>Breckland Council</b>	Further reasoning and detailed area appraisals are required to justify the gaps or amend the gaps or remove the policy	Agree supporting text needs strengthening. See also responses to REG14/006/BDC/061, 062 and 063 above	See above
<b>113</b>	<b>Page 41 2<sup>nd</sup> para d</b>	<b>REG14/006/B DC/065</b>	<b>Breckland Council</b>	Amend to “prevent the coalescence of settlements within the <b>gaps</b> ”	This policy (and the whole of the JNP	No change to Plan

				where planning permission is required approval will only be given for the construction of"	policies) can only apply where development requiring the benefit of planning permission is proposed. Therefore, this is unnecessary to include such reference here.	
114	P42 Map 6	REG14/006/B DC/066	Breckland Council	There is no reference in the key to the map as to which gap is which.	Agree the key needs to reflect this.	Amend Map key
115	4.30 (JNP10)	REG14/005/N CC/007	Norfolk County Council	Norfolk County Council welcome the inclusion of paragraph 4.30 (page 41) within the Neighbourhood Plan and the factual reference to the safeguarded sand and gravel mineral resource and the Minerals and Waste Core Strategy Policy CS16.	Comments welcomed.	No change to Plan

<b>116</b>	<b>P43-48</b> <b>JNP10, 11,</b> <b>12, 13 and</b> <b>14</b>	<b>REG14/006/B</b> <b>DC/067</b>	<b>Breckland Council</b>	Clearly define the areas that the policy applies to	Agree. Clarification in text and on maps	Amend text and maps
<b>117</b>	<b>JNP10 and</b> <b>13</b>	<b>REG14/008/HE</b> <b>/008</b>	<b>Historic England</b>	We also welcome that, in Policies JNP10 and 13 the JNP recommends buildings for inclusion in a District Council level list of local heritage assets. Although we appreciate that buildings are often the most common and easily identified form of non-designated heritage asset, there are often other features and structures that make an important contribution to the character of a place. Examples could be elements such as historic road verges, village ponds, un-listed war memorials etc. If considered important, therefore, the JNP could identify these features in addition to those buildings already highlighted, and afford them a level of protection.	Support for the approach taken by the JNP is welcomed. It is considered that the Character Surveys have picked up the features that are considered to be of heritage value and require protection. However, there may be additions in a future review e.g. The Pill Box in Rushford has been added as a result of other representations.	No change to Plan

<b>118</b>	<b>P43-48</b> <b>JNP10, 11,</b> <b>12, 13 and</b> <b>14</b>	<b>REG14/006/B</b> <b>DC/068</b>	<b>Breckland Council</b>	Reflect the findings of the character appraisal in the policy wording in greater detail. Consider the use of more specific design measures in the policy and improvements and enhancements linked to the Character Appraisal	Agree more detail from the Character Appraisal would be useful here and text has been amended accordingly	Amend text to include conclusion from the Character Appraisal.
<b>119</b>	<b>P43-48</b> <b>JNP10, 11,</b> <b>12, 13 and</b> <b>14</b>	<b>REG14/006/B</b> <b>DC/069</b>	<b>Breckland Council</b>	Ensure that it is clear which area or feature is being referred to in each policy by defining areas the policy applies to on the maps in Appendix A	Agree this could be made clearer.	Maps to be amended
<b>120</b>	<b>Page 43</b> <b>Policy</b> <b>JNP10</b> <b>Croxton</b> <b>Character</b> <b>Appraisal</b>	<b>REG14/006/B</b> <b>DC/070</b>	<b>Breckland Council</b>	Provide additional photos or examples of materials. Also, additional text on local and national policy justification.	Agree more detail from the Character appraisal could be used here and photographs of the non- designated heritage assets included	Photographs have been added to support the policy
<b>121</b>	<b>Page 43</b> <b>Policy</b> <b>JNP10</b> <b>Croxton</b>	<b>REG14/006/B</b> <b>DC/071</b>	<b>Breckland Council</b>	Replace undesigned with non-designated	Agree.	Replace undesigned with non- designated

	<b>Character Appraisal</b>  <b>3<sup>rd</sup> para</b>					
<b>122</b>	<b>Page 43</b> <b>Policy JNP10</b> <b>Croxton Character Appraisal</b>  <b>4th para</b>	<b>REG14/006/B DC/072</b>	<b>Breckland Council</b>	Policy should not lobby Council. Move to text	Comments noted. Wording moved from policy into supporting text.	Remove wording from policy and include in supporting text
<b>123</b>	<b>Page 45</b> <b>Policy JNP11</b> <b>Croxton Areas for Enhancement</b>	<b>REG14/006/B DC/073</b>	<b>Breckland Council</b>	Include a list of what measures may assist in enhancements e.g. landscaping and planting, footpath and signage improvements. This could then link to a community project list and obligation monies via CIL. Include site specific characteristics, design principles for any scheme at the Vicarage	It is proposed to remove reference to the Vicarage in this policy and concentrate on the southern gateway enhancements for which additional text has been added including photographs.	Photographs added, and text amended to refer to southern gateway enhancements and to exclude the Vicarage
<b>124</b>	<b>JNP 11 and 14</b>	<b>REG14/008/HE /009</b>	<b>Historic England</b>	We welcome Policies JNP11 and 14 that identify areas for enhancement within the JNP area, and support	Support welcomed.	No change to Plan

				their general ambitions. In addition to the buildings and sites identified, we suggest that the JNP could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at their enhancement as well. I would be happy to advise further on these points.	The findings of the Character Appraisal work, indicated that the heritage assets were generally in good condition. The Almshouses in Kilverstone are subject to their own policy which is specifically aimed at enhancement (JNP15]	
125	Page 46 JNP12  Kilverstone Alms Houses	REG14/006/B DC/074	Breckland Council	Suggest an overarching policy objective then a series of criteria for which any development proposals would subsequently have to meet. Also, a set of criteria for when redevelopment/demolition would be allowed i.e. when supported by RICS etc.	Policy wording has been revised.	Policy wording amended
126	1 <sup>st</sup> para	REG14/006/B DC/075	Breckland Council	Stray *	Typo – should be (	Remove * replace (
127	1 <sup>st</sup> para	REG14/006/B	Breckland Council	Define affordable housing in the justification, suggest referring to the	Agree. Amend text	Amend text

		<b>DC/076</b>		definition contained with NPPF as this allows for flexibility if national definition changes over time	accordingly	
<b>128</b>	<b>1<sup>st</sup> para</b>	<b>REG14/006/B DC/077</b>	<b>Breckland Council</b>	Need reference to which character area map applies	Agree. Location of Almshouses needs to be on a map	Character Area Map will show location of Almshouses
<b>129</b>	<b>Pg 47 JNP13  Brettenham &amp; Kilverstone Character Appraisal</b>	<b>REG14/006/B DC/078</b>	<b>Breckland Council</b>	Provide additional photos or examples of materials. Also, additional text on local and national policy justification.	Agree more detail from the Character appraisal could be used here and text amended accordingly	Amend text to include photos
<b>130</b>	<b>4<sup>th</sup> para</b>	<b>REG14/006/B DC/079</b>	<b>Breckland Council</b>	Policy should not lobby Council. Move to text	Comments noted. Wording moved from policy into supporting text.	Remove wording from policy and include in supporting text
<b>131</b>	<b>JNP13</b>	<b>REG14/006/B DC/080</b>	<b>Breckland Council</b>	Ensure that it is clear which area or feature is being referred to in each policy by defining areas the policy applies to on the maps in Appendix	Agree this could be made clearer.	Maps to be amended



				A		
132	JNP13 – Brettenham and Kilverstone Character Appraisal	REG14/009/C WPC/002	Coney Weston Parish Council	Support the aspiration to visually enhance the area around the scheduled bridge over the Little Ouse into the village from the east on the C148 and the protection of the open space forming the green. Also, the inclusion of the list of assets of historic importance locally	Support welcomed	No change to Plan
133	JNP13 – Local List for Brettenham	REG14/009/C WPC/002	Coney Weston Parish Council	As the WW2 MT shed is proposed to be included on that list would it not be logical to also include the Pill Box in the wood to the west of Farthingale House which as presumably placed to provide defence to the strategic crossing point.	Support welcomed. Agree to add the Pill Box to the Local List	Add Pill Box to Local List
134	Pg49 JNP14 Areas for Enhancement in B & K	REG14/006/B DC/081	Breckland Council	Include a list of what measures may assist in enhancements e.g. landscaping and planting, footpath and signage improvements. This could then link to a community project list and obligation monies via CIL. What types of development would be supported?	Agree more detail here would be useful and additional text has been included at 4.78 and 4.79	Paragraphs 4.78 and 4.79 amended

<b>135</b>	<b>Page 49</b> <b>Areas for Enhancement in B &amp;</b>	<b>REG14/010/TT C/008</b>	<b>Thetford Town Council</b>	Supportive of enhancing this site but consideration should be given to the adjacent recreational space.  This could be used as a coach park for visitors, however this would need a new footpath by former Bridge Public House	Comments noted.  Reference to the potential to use the site for coach parking as a temporary or interim used to be included in the supporting text.	Amend Plan accordingly
<b>136</b>	<b>Pg49 JNP14</b> <b>Areas for Enhancement in B &amp; K</b>	<b>REG14/006/B DC/082</b>	<b>Breckland Council</b>	Define the disused railway station on the map	Agree. Location of disused station needs to be on a map	Amended Maps required
<b>137</b>	<b>Pg49 JNP14</b> <b>Areas for Enhancement in B &amp; K</b>	<b>REG14/006/B DC/083</b>	<b>Breckland Council</b>	Define the Brettenham West/Arlington Way Character Area on Map 9  This applies to all character areas	Agree, this need reviewing for clarity	Amended Maps required
<b>138</b>	<b>Local Green Spaces</b>	<b>REG14/008/HE /010</b>	<b>Historic England</b>	Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces. Green spaces are often integral to the character of place for any given area, and your plan could include	Agree that the protection of green spaces identified in the Character Appraisal has not translated into	New policy JNP14 relating to green spaces has been devised.

				<p>policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here:</p> <p><a href="https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces">https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces</a>.</p>	<p>policy.</p> <p>Additional policy required (JNP14)</p>	
139	Assets of Community Value	REG14/008/HE/011	Historic England	<p>You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with</p>	Comments noted	No change to Plan

				regard to how they are conserved. There is useful information on this process on Locality's website here: <a href="http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/">http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/</a>		
<b>140</b>	<b>P51 Appendix A</b>	<b>REG14/006/B DC/084</b>	<b>Breckland Council</b>	Reduce the size of the text to be consistent with the plan	Text to be revised	Text size revised
<b>141</b>	<b>P52-56 Map 7-11</b>	<b>REG14/006/B DC/084</b>	<b>Breckland Council</b>	Define the areas the policies refer to, to ensure policy and supporting text make clear the justification for the character area. The maps should show the full extent of the character areas.	Maps to be reviewed	Amended maps required
<b>142</b>	<b>Glossary</b>	<b>REG14/008/HE /015</b>	<b>Historic England</b>	We recommend the inclusion of a glossary containing relevant terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets enjoy	Comments noted. Glossary to be added as Appendix C	Add glossary as Appendix C
<b>143</b>	<b>Additional Points</b>	<b>REG14/010/TT C/017</b>	<b>Thetford Town Council</b>	There should be some means to ensure the overall vision and aims of	No specific detail is suggested. The JNP will assist in the	No change to Plan

				the SUE are achieved	delivery of the agreed SUE vision and SUE policy has been revised as a consequence of other representations	
<b>144</b>	<b>Additional Points</b>	<b>REG14/010/TT C/018</b>	<b>Thetford Town Council</b>	There is no cemetery provision, and this is required, as non-parishioners cannot be buried in Thetford	The SUE shows in Phase 5 the provision of a cemetery which can be bought forward as a need has been established	Supporting text amended accordingly
<b>145</b>	<b>Additional Points</b>	<b>REG14/010/TT C/019</b>	<b>Thetford Town Council</b>	NP does not refer to the potential development in Brettenham, which has been highlighted by a recent planning application from Shadwell Estate	Text referring to the application has been included in Policy JNP11	Revised text for JNP 11 (formerly JNP9)
<b>146</b>	<b>Additional Points</b>	<b>REG14/010/TT C/020</b>	<b>Thetford Town Council</b>	There is no reference to traditional parish roles. When completed the size and population of the SUE will be similar in size to a town like Swaffham and would require a similar level of council	Comments noted. This is not a matter for the JNP	No change to Plan

				responsibility. With an indicative annual precept of £300-400k per annum the NP needs to address how this would be administered. By the PCs		
<b>147</b>	<b>Additional Points</b>	<b>REG14/010/TT C/021</b>	<b>Thetford Town Council</b>	NP makes no reference to the allotments and their management.	This refers to the requirements of the S106 to which the Parish Councils did not have an opportunity to influence. However, if allotments are allocated within the PC areas then they would manage them.	No Change to Plan
<b>148</b>	<b>Additional Points</b>	<b>REG14/010/TT C/022</b>	<b>Thetford Town Council</b>	NP makes no reference to the play areas and their management	This refers to the requirements of the S106 to which the Parish Councils did not have the	No Change to Plan

					<p>opportunity to influence.</p> <p>However, if play areas are allocated within the Parish Council areas they will manage them</p>	
<b>149</b>	<b>Additional Points</b>	<b>REG14/010/TT C/023</b>	<b>Thetford Town Council</b>	<p>NP makes no reference to extending of graveyards to accommodate the approx. extra 100 deaths a year when the SUE is complete as above – perhaps we should include this after talking to Pigeon</p>	<p>See response to REG14/010/TTC/018 above</p>	No change to Plan
<b>150</b>	<b>Additional Points</b>	<b>REG14/010/TT C/024</b>	<b>Thetford Town Council</b>	<p>NP makes no reference to the management of footway lighting</p>	<p>This refers to the requirements of the S106 to which the Parish Councils did not have the opportunity to influence.</p> <p>However, if these items are allocated within the Parish Council areas the PCs would manage</p>	No Change to Plan

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					them.	
<b>151</b>	<b>Additional Points</b>	<b>REG14/010/TT C/025</b>	<b>Thetford Town Council</b>	This NP was discussed, in respect of its possible relevance to the governance review decision	Noted.	No change to Plan



**Appendix S - Character Appraisal - REG 14 CONSULTATION - Response Table**

<b><u>POLICY/ PARA NO.</u></b>	<b><u>Reference No</u></b>	<b><u>Name of Respondent</u></b>	<b><u>Summary of Representation</u></b>	<b><u>PC Suggested Response</u></b>	<b><u>Action</u></b>
<b>General</b>	<b>REG14/005/ NCC/009</b>	<b>Norfolk County Council</b>	The Character Appraisal is detailed and looks at the character of a number of areas, with a summary of heritage assets for each area (referencing various data sources; Norfolk Heritage Explorer, Norfolk Historic Environment Record data, the National Heritage List, parish archives and residents) and puts forward candidates for a local list	Comments welcomed	No change to Plan
<b>General</b>	<b>REG14/005/ NCC/010</b>	<b>Norfolk County Council</b>	Although Historic England's published guidance on the preparation of Neighbourhood Plans ( <a href="https://historicengland.org.uk/advice/planning/planmaking/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/planmaking/improve-your-neighbourhood/</a> ) is not directly referenced, its main recommendations have been followed.  This is one of the highest quality Neighbourhood Plans the Historic Environment Service has seen	Comments welcomed  Reference will be made in the introduction to the Historic England guidance	Incorporate reference to Historic England Guidance at para 1.6 of the Introduction
<b>General</b>	<b>REG14/008/ HE /002</b>	<b>Historic England</b>	In general, we welcome this very comprehensive, well ordered and informative JNP document, which includes general reference to the history and character of the three parishes throughout, as well as paying attention to the area's character and historic environment. In particular, the preparation of the wide-ranging supporting Character	Support welcomed	No change to Plan

			Appraisal Statement that identifies individual character areas within the JNP area is welcomed as a useful evidence base for the policies within the plan, especially given the present absence of an up to date Conservation Area Appraisal and Management Plan for Croxton.		
<b>General</b>	<b>REG14/008/ HE /003</b>	<b>Historic England</b>	We therefore welcome the identification of the Croxton Conservation Area and the listed buildings within it on the map provided in Section 1 of the plan, as well as the maps accompanying each of the character areas identified by the Character Appraisal, which also indicate the other heritage assets present in each area. The only suggestion we would make would be, if possible, to modify the maps slightly to indicate what grade of designation the listed buildings were (Grade I/II* or II) as part of the colour coding.	Support welcomed. Agreed it useful to have a map showing the specific designations and grades. This could be incorporated into the Character Area Maps	Amend character area maps to show all heritage assets – designated and non-designated
<b>JNP1</b>	<b>REG14/008/ HE/005</b>	<b>Historic England</b>	We also welcome policy JNP1, dealing with the design of new housing and the use of materials. The use of the Character Appraisal Statement as an evidence base to underpin this policy and others is, as noted above, considered a useful and comprehensive approach.	Support for policy welcomed	Change to Plan
<b>6.7</b>	<b>REG 14/ 001/ CLAYDON -</b>	<b>Leah Claydon</b>	Would be nice to see the 2 village ponds getting a mention. They could be important for local wildlife – frogs, toads, newts, sticklebacks,	The 2 ‘ponds’ referred to, are one at south of village which	No change to Plan

	005		Have they been surveyed? Is there a plan to maintain them?	occasionally overflows down The Street and a second one at north of village. They are both on Crown land; the north one in tenant farmers fields, the southern pond is fenced off for safety reasons. There are currently no plans to make either more publicly accessible and this would require agreement/ approval from the Crown Estate and the tenant farmer and financial investment again for which there is currently no	
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				allotted funding.	
<b>7.5.10</b>  <b>Local List for Brettenham Areas for Enhancement or Specific Protection</b>	<b>REG14/009/  CWPC/002</b>	<b>Coney Weston Parish Council</b>	As the WW2 MT shed is proposed to be included on that list would it not be logical to also include the Pill Box in the wood to the west of Farthingale House which as presumably placed to provide defence to the strategic crossing point.	Support welcomed. Agree to add the Pill Box to the Local List	Add Pill Box to Local List

**Appendix T – List of Consultees – used for Reg 14**

Breckland Council (LPA)	East of England Local Government Association
Norfolk County Council	Elizabeth Truss MP
Suffolk County Council	Equality and Human Rights Commission
Forest Heath District Council	Friends, Families and Travellers and Traveller Law
St Edmundsbury Borough Council	Fields in Trust
Mid Suffolk District Council	Forestry Commission
South Norfolk District Council	Freight Transport Association
Thetford Town Council	G P S S
The Coal Authority	George Freeman MP
Norfolk Chamber of Commerce	Gypsy Roma Traveller Achievement Service
Natural England	Hastoe Group
Historic England	Health & Safety Executive
Highways England	Historic Environment Service
Sport England	Home Builders Federation
Environment Agency	Iceni Homes Ltd
National Grid	Keystone Development Trust
UK Power Networks	LINK-UP Breckland's Talking Newspaper
Amec	Norfolk Fire Service
Homes and Communities Agency	Norfolk Geodiversity Partnership
New Anglia Local Enterprise Partnership	Norfolk Living Well
Equal Lives	Norfolk Police and Crime Commissioner
Federation of Small Businesses (W Norfolk Branch)	Norfolk Rural Community Council
Friends of the Earth	
Norfolk Local Access Forum	
Ramblers Association	

The Brecks Partnership	Norfolk Wildlife Trust
Norfolk Biodiversity Partnership	Norwich Diocesan Board of Finance Ltd
NHS Norfolk	Office of Rail Regulation
Granta Housing Association	Orwell Housing Association Ltd
BT PP03	Renewables East
NHS Property Services Ltd	RSPB - East Anglian Regional Office
Mobile Operators Association	Secretary of State for Transport
Age UK	Skills Finding Agency
Airport Operators Association	Sustrans
East Anglian Ambulance Trust	The Crown Estate
Ancient Monuments Society	The National Federation of Gypsy Liaison Groups
Breckland Astronomical Society	The Society for the Protection of Ancient Buildings
British Geological Survey	Wherry Housing Association
Broadland Housing Association	Woodlands Trust
Campaign for Real Ale (CAMRA)	Norfolk Constabulary
Church of England	Suffolk Constabulary
Civil Aviation Authority	Anglia Water Services Ltd
Communities and Local Government	East Midland Trains
CPRE Norfolk	Greater Anglia
Crime Prevention and Architectural Liaison Officer	Salix River & Wetland Services Limited
Defence Estates Headquarters	Wayside Mews Collectibles
Design Council CABE	Daves Emporium Ltd
Diocese of Norwich	Greater Thetford Development Partnership
Disabled Persons Transport Advisory Committee	
Wretham Parish Council	

Euston Parish Council	Resident Association Thetford
BTO	Barnham Parish Council
Kilverstone Estate	Barnham Cross Residents Association
Shadwell Estate	Croxton Road Residents Association
Rushford Estate	Weeting Parish Council
Carter Jonas (Agent	Mundford Parish Council
Coney Weston Parish Council	
Hopton cum Knettishall Parish Council	
Harling Parish Council	
Garboldisham Parish Council	
Bridgham Parish Council	

This document was produced on behalf of Croxton and Brettenham & Kilverstone Parish Councils by:  
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