**Comments on the Reedham Neighbourhood Plan – Broads Authority 08.11.22- 11.11.22**

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| **Broads Authority Comments** | **Reedham Neighbourhood Plan group response (CCP)** | **Reedham Neighbourhood Plan Group response** |
| Para 2: 12 km2 – 2 should be superscript - | Changed |  |
| Para 4 – says there are two pubs then says there are three pubs | changed the last sentence to ‘Both pubs’ | There are 3 pubs, amend to ‘all the pubs’ |
| Pages 11 to 17 – I would suggest that repeating the policies, with no supporting text or context, is not needed. The policies need their supporting text as that sets the context as well as information on how to deliver the policy. Perhaps list the policy titles, but equally, the contents page does that. Repeating the policies adds 6 or 7 pages to the Local Plan. – | Are the group happy to remove this? | No. Retention of Policies at the start of the document was agreed but the Community Actions will be moved to below the relevant Policy. |
| **Heritage and Design officer**  Page 11, Policy 3 Design This includes the sentence ‘although the Design Guidance and Codes does not apply to development in the Broads Authority Executive Area’. Tell me if I am wrong Nat but I thought we had agreed that this one would be applicable to the BA Exec area?  Under d) there is no natural stone in Norfolk so assume they mean flint. Perhaps just state flint as this is the only vernacular stone?  Page 29 – Policy 3 – this version of the policy is different to the version at the beginning of the document and doesn’t contain the disclaimer about it not being applicable in the BA Exec Area. Consistency needed. I think this one is right. | Agree on the need for consistency. This must have been an error.  What is the groups view on removing the list of policies at the beginning – which was also suggested by Broadland.  For Policy 3 – change the reference from natural stone to flint. | No (see above). |
| Pages 17 to 19 – as above, repeating the actions is not needed.. | Agree it may be better to remove this |  |
| Para 31 – figure is missing – says xx. | This is now para 30- 40-60 new homes |  |
| Para 31 – you might want to say here or somewhere in the Plan, that the Local Plan for the Broads does not allocate housing in Reedham or have a housing need figure for the area or have a development boundary.  Added to the end of Para 30- “ | Regarding the Broads Local Plan there is no housing need figure for Reedham, no housing has been allocated in the parish and there is no development boundary in the Broads Local Plan for Reedham.” | Addition of an explanatory footer to say Housing Allocations in Reedham derive from the Broadland Local Plan, the Broads Authority Local Plan does not allocate housing in Reedham. |
| Para 32 - says ‘the Local Plan’ but there are a few local plans relevant. Say which Local Plan you are referring to. | Broadland |  |
| Para 40 – uses data from 2011 – anything more recent? | This para (now Para 41) was referring data provided in the Housing Needs Assessment which only focused on 2011 Census data. |  |
| Policy 1 – query about the wording: Except for developments comprising self-build, and conversions where justified, new residential development should offer a housing mix whereby at least 80% of homes are three-bedrooms or fewer, unless evidence is provided either showing there is no longer such a local need, or the scheme is made unviable.  ‘Developments comprising self-build’ – there could be a situation whereby a larger scheme has a certain amount of plots for self-build included within it. Going by what you have written, because that scheme comprises self-build, then the policy would not be relevant. Do you mean self build developments or developments that have an element of self build as part of them? Would suggest you check this. Indeed, Policy 5 of the GN Local Plan requires at least 5% of plots on residential proposals of 40 dwellings or more to be self build.  Why are conversions not included in this policy?  ‘Where justified’ is randomly placed – what is that referring to?  ‘Should’ is a weak term. ‘Will’ is a strong term. | Group to discuss the point about self-builds  Conversions are included in the policy “except for developments compromising self build, and, conversions”  Agree, it could be worded better may not need the words where justified- rephrased to this  “New residential developments, except for self-build plots and conversions, will offer a housing mix whereby at least 80% of homes are three-bedrooms or fewer, unless evidence is provided either showing there is no longer such a local need, or the scheme is made unviable.”  Agree changed should to will. | The following was approved: “New residential developments, except for self-build plots and conversions, will offer a housing mix whereby at least 80% of homes are three-bedrooms or fewer, unless evidence is provided either showing there is no longer such a local need.” |
| Para 45 – any more recent data than 2018? | This was from the Housing Needs Assessment which I believe took the latest data they could find on lower quartile average income. |  |
| Policy 2  first part says ‘should’ then second part says ‘will’ – there is a difference in strength of wording there.  Not necessarily supporting it or otherwise, and Broadland Council are the Housing Authority and may have a view, but where is the evidence e to justify the local eligibility criteria?  D – what is ‘local employment within Reedham’ versus ‘working in Reedham? | Agree change both to will.  I have added into the policy wording the reference to the criteria being used for First Homes. We had advice off BCKWLN housing team that local criteria could be used for First Homes in policies so thought it was a good idea to do elsewhere in Norfolk. In the first homes guidance - [First Homes - GOV.UK (www.gov.uk)](https://www.gov.uk/guidance/first-homes#first-homes-eligibility-criteria) it does say under Para 008 that local eligibility criteria can be applied in neighbourhood plans and may include connections such as current residency, employment requirements, family connections etc. It does go on to say that any local eligibility crtieira will apply for a maximum of 3 months from when a home is first marketed and if a suitable buyer has not reserved a home after 3 months then it will revert back to the national criteria. Will add this into the supporting text (under now para 49) –  “*As set out in the First Homes Guidance[[1]](#footnote-2), neighbourhood plans can apply eligibility criteria in addition to the national criteria. This can include having local connections such as current residency, employment requirements, family connections or special requirements. Policy 2 sets out local criteria for the Reedham Neighbourhood Plan. As set out in the Government guidance on First Homes, any local eligibility criteria will apply for a maximum of 3 months from when a home is first marketed. If a suitable buyer has not reserved a home after 3 months, the eligibility criteria (including income caps) will revert to the national criteria set out above, to widen the consumer base*.”  Clause D says people who are working in local employment within Reedham which would be people working in Reedham. |  |
| Para 55 – you may also want to reference that we are currently out for consultation and are preparing a design guide for the Broads. | Add reference to this at the end of para 56. |  |
| Para 59 – isn’t a key point for context that the village sits in the Broads which has an equivalent status to a National Park? In fact, as a general observation, I don’t really see much in the Plan about the Broads and its status. | Accept the comment. These key points were summarising the information in the design guide. Add into point f- “the village sits within the Broads which has the equivalent status to a National Park”.  Also add under Natural Environment a new para 67 –  “Another important factor is that Reedham sits within The Broads which has the equivalent status to a National Park. The Broads is a Special Area of Conservation which contains several examples of naturally nutrient rich lakes[[2]](#footnote-3). It is made up of a series of flooded medieval peat cuttings that lie within the floodplains of five principal river systems known as Broadland. The area includes the river valley systems of the Bure, Yare and Waveney and their major tributaries. The distinctive open landscape comprises a complex and interlinked mosaic of wetland habitats including open water, reedbeds, carr woodland, grazing marsh, tall herb fen, transition mire and fen meadow, forming one of the finest marshland complexes in the UK[[3]](#footnote-4). “  Further detail on The Broads is in the evidence base. |  |
| Policy 3  Just checking the threshold for the policy – you say ‘all development’. So replacement windows? Signs? Sheds etc? Or is it just all new buildings?  Wills, should again.  Point f has two points. Suggest they are separated out – the second one might get lost. | Amend as suggested.  Good point separate them. |  |
| Para 65 – says ‘the local plan’ – which local plan? | Policy 5 goes further than policies referring to parking set out in both the Broadland and The Broads Local Plans, it provides necessary design details appropriate to Reedham and the Design Guidance and Codes Document (2022). |  |
| **Heritage and Design officer**:  Not in our area but policy 4 – on-plot parking just says well-designed soft landscaping required. I would suggest hard and soft landscaping can help to mitigate parking areas. | I believe the officer is referring to Policy 5. Note the comment and recommend adding in hard and soft landscaping. |  |
| Policy 5  Uses the term ‘should’ again. In some cases ‘must’ is used… why the difference?  In terms of EV charging points, isn’t this now set out in building regulations? | We will change them all to must now.  Yes, [The Building Regulations 2010 (legislation.gov.uk)](https://www.legislation.gov.uk/uksi/2010/2214/regulation/44D) so we can remove this clause. |  |
| Para 75 – you may want to say something about what applicants need to do to address BNG – I am presuming you want them to use the most up to date metrics, including the small sites metric? What are the thresholds for use which metric? | Add detail on this into the supporting text. |  |
| Para 76 – Local Plan for the Broads also requires biodiversity enhancements and we have an associated guide. | Add something into the supporting text I cannot add a link with regards to footnote 51 of the Broads Local Plan because it comes up as page not found. [Page not found (broads-authority.gov.uk)](https://www.broads-authority.gov.uk/planning/Planning-permission/design-guides)  The local plans have general policies protecting landscape and its features, including protecting nocturnal character, important views and protecting and enhancing biodiversity, including supporting a green infrastructure network. The Broads Local Plan policy SP6 requires biodiversity gains wherever possible paying attention to habitats and species. It also requires biodiversity enhancements which The Broads Local Plan has an associated guide. The emerging GNLP Policy 3 requires a 10% net gain in biodiversity and for all residentialdevelopment to address potential visitor pressure on designated sites through a standard contribution.  Further detail on The Broads is in the evidence base. |  |
| Policy 6  Refers to native species. I don’t have an answer at the moment, but we are looking into the following… given the changing climate, are native species the way forward. You may want to talk to BDC about this.  Community action 1 says ‘The Parish Council will work with the local community to encourage action to enhance habitat and wildlife public areas and in people’s gardens’ – for the yellow – is this wording superfluous? For the green, is there something missing where indicated? Perhaps ‘in public areas’ | Need to think about the first point – this has just also been raised by the examiner for the Hemsby NP.  Consider the action point with the group is the yellow highlighted wording necessary and maybe be specific on the public areas? | Amend to ‘predominantly native species with due regard to climate resilience within the timescale of the current plan’.  Leave as is. |
| Para 92 – suggest you say also that the dark skies study for the Broads found parts of Reedham in the Broads to be zone 2. | Add in wording after reading over the document – “In the dark skies study for the Broads this found that parts of Reedham were in Category 2[[4]](#footnote-5) which are considered to be dark skies (>20-21).” |  |
| Policy 9  This is a different approach to our policy DM22. What is written is good for the part of Reedham not in the Broads as there is no light pollution policy in place already. But are you saying you want this to apply to the entire parish, including that part which is the Broads where, arguably, a stronger policy on light pollution is in place? Or did you want this policy to apply to the Broadland part of Reedham only? If you want this to take the place of our existing policy, this would need to be justified in the supporting text and it is not at the moment.  Something that you don’t talk about in the policy or supporting text is an applicant thoroughly justifying the need for lighting in the first place.  When you say ‘all planning consents must respect the following criteria in relation to external lighting’, would it be better to say that any lighting as part of a scheme must be designed so it meets those criteria? Rephrase to this  Is the list of criteria and or or? Do all these criteria need to be met? If so, say and after each one. We would suggest AND  I would suggest that the third bullet point should be two bullet points – one for dusk to dawn lighting and one for timed motion detectors. Split this up  Formatting – the text after the 4th bullet point is indented. I don’t think it is meant to be a bullet point, but another paragraph? Yes it is another paragraph  The last part of the policy about internal lighting – it is not written very well. What are you trying to achieve? What is the instruction here? Is it that glazed elements of schemes are expected to not become a source of light and impact will need mitigating through the use of blinds or curtains? Think about this point  You might want to reference this guide: <https://www.southdowns.gov.uk/wp-content/uploads/2021/08/Towards-A-Dark-Sky-Standard-V1.1.pdf> | Recommend amending the policy so that it applies to the area outside of the BA area.  In relation to external lighting, to minimise light pollution, any lighting as part of a scheme must be designed following the below criteria:   1. Fully shielded (enclosed in full cut-off flat glass fitments); and 2. Directed downwards (mounted horizontally to the ground and not tilted upwards); and 3. Avoid dusk to dawn lighting; and 4. Introduce timed motion detectors; and 5. Use low-energy lamps such as LED, metal halide or fluorescent sources   Where internal lighting is likely to cause disturbance to humans or wildlife, proposals will be sought for mitigating pollution from internal light sources. Large windows and roof lights are particularly relevant in this context.  We would suggest AND in the criteria  Split third bullet point into two  Yes it is another paragraph  Think about this point on last part of the policy  We have referenced this dark skies document in footnote 24 | Copy/amend policy to mirror the BA Policy on Dark Skies - DM22.  Add ‘the Dark Skies policy should be a key consideration in the placement of windows’ |
| Is there a community action to try to reduce light pollution from existing sources in the community? | Do the group want one? | No |
| Is there a community action to work with those at risk of flooding to make their property resilient to the impacts of flooding? | Do the group want one? | No |
| Para 106 – should the equivalent policies in the Local Plan for the Broads also be mentioned here? | Yes, it was mentioned just forgot to put The Broads Local Plan in front of the wording. However, reconsidered the policies and now Para 108 says The Broads Local Plan Policies SP16 resist the loss of existing community services. In Policy DM7 open space, play space, sport fields and allotments identified on The Broads policies maps are also protected from loss unless developments met the set criteria. In policy DM44 community, visitor or recreational facilities and services will only be permitted under certain criteria including the proof there is no community need. |  |
| Policy 11  Says ‘the Local Plan’ – which Local Plan?  Some of these are not in Broadland’s planning area… some are in the Broads Authority Executive Area.  Your policy is probably ok, just needs tidying up in terms of the Local Plans phrase, which would also link back to the comment on para 106 | Have thought about this, hopefully these policies in both local plans are fit for purpose. Added in some more wording to now Para 107 and 108.  107-NPPF para 92 supports the protection of existing village services and the delivery of new ones to maintain the vitality of rural communities. The Broadland Local Plan supports proposals which improve the range of community facilities and local services available, including outside of the settlement, where need is demonstrated. In the Broadland Development Management DPD (2015) Policy E2 states sites which are in employment use will be retained unless evidence meets the set criteria. In Policy CSU2 it states proposals which involve the loss of community facilities, or a local service should be avoided.  108-The Broads Local Plan Policies SP16 resist the loss of existing community services. In Policy DM7 open space, play space, sport fields and allotments identified on The Broads policies maps are also protected from loss unless developments met the set criteria. In policy DM44 community, visitor or recreational facilities and services will only be permitted under certain criteria including the proof there is no community need.  **Policy amendment:**  The following community facilities and services will be designated as community facilities for the protection provided by Policy SP16 and DM44 of the Broads Local Plan and Policy E2 and CSU2 of the Broadland Local Plan.   * Primary School and Nursery * Doctors Surgery * Post office * Village Hall * Railway station * Ferry |  |
| Policy 12  You might want to say ‘supported in principle, subject to other relevant policies of the Development Plan’. | Agree add as suggested |  |
| Policy 13  Are you sure you want rural buildings, which are likely to be isolated, to be used for shops, indoor sport, GPs?  To get to them, people will no doubt rely on cars (see para 115 onwards).  This would also change the nature of the rural buildings, to more town centre, urban uses.  Also, once a site is E class, they can change to something else in that E class without permission, which you may not want them to. List of E class uses is here: [Use Classes - Change of use - Planning Portal](https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes)  Also, how does the location of such land use classes fit with the local plans and the NPPF? The NPPF considers retail development as a main town centre use and retail is part of class E so this policy seems to be contrary to the NPPF – see section 7 of the NPPF.  You say that the policy approach does not include industrial processes, but look at the link above and that is part of Class E – E(g)(iii)  I am confused by the wording here. I have read it a few times and not sure what it means: ‘of commercial use of community use’.  The last part of the policy is oddly worded. It says ‘Where an extension is acceptable…’ – I wonder if you mean ‘for an extension to be acceptable…’? It does not make sense to me as worded.  I am happy to talk this through with you – perhaps a meeting with BDC and me would be good. As written, if this continues into the Local Plan, we may object. | For discussion, this point was also raised by Broadland DC. | As per the BDC comments the Policy will be reworded to focus on the impacts of any change of use. |
| Figure 17 – what are the things identified? The title does not explain. I can also guess what the symbols are, but maybe it would benefit from a key? | The maps were not made by us but we could make a separate key stating what the symbols show e.g. church, station, camping, cafes, shopping, toilets and the circular route. |  |
| **Heritage officer**: Page 57/58  Para 57 – would suggest the area around the church might be considered another area of development.  Para 58 – the train goes to Lowestoft as well | Consider the points make the reference in the supporting text. | The area around the church is not within the development boundary of Reedham therefore this is not appropriate.  Ignore. |
| Policy 14  Does this include cycle parking? It might be better to say car parking and cycling parking – people might just think car parking. But given the preamble, I think you want cycle parking to be improved too  If there is no primary school pupil cycle parking standard, do you want to set one?  What about scooter parking at the school as well? I can imagine lots of children scoot in, or want to. | Agree-  Development proposals coming forward that will improve or expand car, cycle and scooter parking provision for Reedham Primary School and aid car parking issues faced by the village will be supported.  Group to consider cycle parking standard – would we need to do anything in particular on this point?  I am sure children probably do scoot in if there is storage for the scooter/bikes. Add in scooter to the parking provision above. | This has not been mentioned in any of the consultations. |
| Community Action 4 – does the school have a travel plan? Is it up to date and working? Could that form part of the action perhaps? | Group to answer? | No. Parking issues are mentioned regularly but this is out of the school’s control. |
| Policy 15  There is no policy on designated heritage assets. Should this cover both? A list of designated heritage assets could also be provided. Not sure about the wording in the last sentence. If proposals are adjacent to a non-designated heritage asset, its unlikely that any proposals will cause actual physical harm to the heritage asset and its distinctive features – which is how the policy could be read.  The word ‘adjacent’ could also be open to interpretation or read narrowly to mean immediately adjacent, when in actual fact proposals some distance away could have a detrimental impact on setting. Also, all the policy says applicants need to do is give it some consideration, not actually mitigate harm. I would suggest that the policy should be about setting and could cover all heritage assets so should be re-worded something like:  ‘*Proposals should demonstrate whether there will be any harm caused to the character, appearance, significance and setting of designated and non-designated heritage assets and what measures will be taken to mitigate any harm’.* | Point with respect to proposals adjacent also raised by Broadland DC. For discussion. | Heritage Assets are covered by their own legislation and therefore this is not appropriate in a Neighbourhood Plan. |
| **SEA/HRA Document**  Just to say that one figure does not have a key – Figure 17. Well, it has a key, but the pink stripes are not in the key. Also, as per figure 17 comment below, the same map is in this SEA/HRA as Figure 15 and might benefit from a key. There are a few yellow highlighted bits that need filling in. Finally, a general comment with regards images. To make the plan accessible, the images need detailed alt text behind them. | CCP will address these comments. |  |
| **Local Green Space document**  No comments. Seem ok to me and justified. Are any of these protected by BDC policies as open spaces? | Need to check this. | It was thought not. |
| **Views document**  The map under figure 1 does not have a title and does not have an OS Copywrite. Page 5, 6, 7 etc – table formatting issue. | CCP will address these comments. |  |
| **Design Guide**  Generally, I would welcome acknowledgement in the Guide that the Broads is a member of the National Park family – that it has a status equivalent to a National Park.   * Para 1.3 says ‘The parish falls on the boundary between Broadland District Council and the Broads Authority’ – that is not quite right. The parish is in Broadland and part in the Broads Authority Executive Area. * Page 27, DC.01 –. It is not clear if this is just about development in the Broads part of Reedham or in all of Reedham? The text in the green box could apply to all of Reedham. * Page 29 – first bullet in green box – what about onward cycle links as well? * Figure 30 shows about 4 houses in a row, yet the last bullet point in the green box says 3+ houses in a row is not typical in Reedham. * Page 34   first bullet: I am not sure that lighting schemes are important in residential areas. Why has the guide said that? And what do they consider to be lighting schemes? Street lighting provided by the Local Authority or private security lighting? This is a throw away sentence without due clarification and needs addressing, especially given the stance in the Plan itself to address light pollution. Also, what are unacceptable levels of light pollution? Again, this is contrary to the stance of the Neighbourhood Plan and also the Local Plan for the Broads.  second bullet – uses the word ‘consider’ – why only consider lights that can be turned off? Why not require it? 5 th bullet point – ground based lighting could point up and cause light pollution, so what do you mean?  Figure 38 does not show a good light. The bulb is below the casing and therefore is not fully shielded. Suggest a better image is used that shows well designed lighting. - there is nothing in there about the need to justify lighting in the first place and nothing about the intensity and only lighting the lighting task.  We may have to object to this part of the Guide, unless it can be clarified.   * Between 4.1 and 4.5 inclusive is specific to the two sites. But 4.6 refers to any housing development in Reedham. So it seems that 4.6 needs to be its own chapter, perhaps called housing design codes? It is confusing as it is as one part of Chapter 4 says that chapter only applies to the two sites, but another part says 4.6 applies to all housing… * Figure 68 shows a parking space for a car, but it is under the cycle parking section and the title says it shows cycle storage. Is it that the green shaded area is for bikes? It does not say that. How does one get a bike out, if that is where bikes need to go? * Page 58, footnote 6 – enhancements is spelt wrong * Page 62 to 67 – can’t see mention of dark skies and light pollution here. Might need mentioning in 1 or 3? * Page 67, number 10 – called car parking. This should say car parking and cycle parking I would suggest. | Are these in addition to previous comments provided by the BA on the Design Guide or have these already been fed back to AECOM? | As per the BDC response it is not possible to amend the Design Guide. It was acknowledged to be an imperfect document but there were only so many times one could request the same amendments… |

1. [First Homes - GOV.UK (www.gov.uk)](https://www.gov.uk/guidance/first-homes#first-homes-eligibility-criteria) [↑](#footnote-ref-2)
2. Natural England. 2014. EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora Citation for Special Area of Conservation (SAC). Source: [European Site Conservation Objectives for The Broads SAC - UK0013577 (naturalengland.org.uk)](http://publications.naturalengland.org.uk/publication/6190476679970816) [↑](#footnote-ref-3)
3. JNCC.2008. Information Sheet on Ramsar Wetlands mentioned Broadland and The Broads. Source: [untitled (jncc.gov.uk)](https://jncc.gov.uk/jncc-assets/RIS/UK11010.pdf#:~:text=Broadland%20is%20a%20low-lying%20wetland%20complex%20in%20eastern,support%20an%20extremely%20diverse%20range%20of%20plant%20communities.) [↑](#footnote-ref-4)
4. Broads Authority. 2016. Dark Sky and Night Blight Data comparison. Source: [Appendix-K-Assessment-of-Night-Blight-and-Dark-Skies-Survey-Data.pdf (broads-authority.gov.uk)](https://www.broads-authority.gov.uk/__data/assets/pdf_file/0018/231219/Appendix-K-Assessment-of-Night-Blight-and-Dark-Skies-Survey-Data.pdf) [↑](#footnote-ref-5)