**REEDHAM NEIGHBOURHOOD PLAN: PRE-REG. 14 DRAFT BROADLAND DISTRICT COUNCIL COMMENTS AND REEDHAM NP RESPONSE – 03.01.23**

| **Section** | **Response** | **Reedham Neighbourhood Plan group response (CCP)** | **Reedham Neighbourhood Plan Group agreed response** |
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| General | Place Shaping TeamThe end date for the Neighbourhood Plan is 2036. We would query whether this was originally intended to follow the end date of the emerging Local Plan (the GNLP – i.e. 2038), which was originally 2036 but was subsequently extended to 2038. In many ways, it would be more practical for the Neighbourhood Plan to run parallel to and follow the same period as the contemporaneous Local Plan.The final version of the JCS was adopted in 2014. References to the JCS should therefore be followed by ‘(2014)’ rather than ‘(2011)’.From a reader's perspective, it would be useful if possible, to keep the policies to same page through the document.Senior Design and Heritage OfficerThere doesn’t seem to be much in the way of policy for the space between the two parts of the settlement. It might be worth considering if there is any desire to look at a policy on how it may be used in future. | Consider this point. Does the group wish to extend the date to 2038? Make amendment to the JCS adoption date.Noted on trying to keep policies on the same page throughout the document. Consider the heritage officers comments?  | YesThe vision for Middle Field is for it to remain undeveloped unless it can be used for a new school and/or Village Hall and playing field. MT and LC will create a Gap Policy to state it should remain undeveloped apart from for education and recreation provision. |
| Figures/Images | Place Shaping TeamPlease make sure that all figures and diagrams are correctly referenced with the source.  | This will be checked. |  |
| Paragraph 8 (pg. 3) | Place Shaping TeamThere is a typo in ‘12 pupils in a sessions’ | Noted will amend. |  |
| Paragraph 13 (p.4) | Place Shaping TeamThe first sentence of this paragraph is a little clunky. It feels as if the comma separating ‘Policy 15’ from ‘, in Service Villages land will be allocated…’ should be a full stop. I.e. ‘…under Policy 15. In Service Villages, land will be allocated…’ | Agreed the sentence is too long will amend this.  |  |
| Paragraph 14 (p.4) | Place Shaping TeamAgain the first sentence is quite long and clunky and could usefully be broken up into smaller, clearer sentences. | Agree will amend.  |  |
| Paragraph 16 (pg.4) | Place Shaping TeamThe figures identified for each site are incorrect. The total number of new homes for Reedham as per the GNLP document is approx. 60, with each site identified for 30 homes. You can see the latest version of the document here: <https://www.gnlp.org.uk/sites/gnlp/files/2021-10/1.%20Part%20Two%20Sites%20Plan%20-%20Feb%202021.pdf> | Noted. Will make the amendments.  |  |
| Figure 1 (p.4) | Place Shaping TeamThe caption should highlight that this plan is taken from the Site Allocations DPD. | Noted will make the amendment.  |  |
| Figure 2 (p.5) | Place Shaping TeamSuggest the caption reads ‘Reedham Site Allocations in the submitted GNLP (2020)’ | Noted will make the amendment. |  |
| Paragraph 20 (p.6) | Place Shaping TeamThe final sentence should read, ‘Looking at Figure 4, we are at the stage of…’With reference to this statement, you may consider it easier to remove it altogether from the Plan, as it will require constant updating as the Plan progresses and will likely be removed from the final Plan in any case. | Noted on the point about the last sentence. What do the group think is best? Shall we remove the sentence or just amend this at each stage?  | Remove |
| Paragraph 23 (p.7) | Place Shaping TeamShould this read ‘A consultation ***exercise*** was held with residents ***between*** July and September 2021’? An event implies a one-off activity. | Amend |  |
| Paragraph 30 (pg.11 -19) | Place Shaping TeamIt may cause confusion to have a paragraph listing the policies and community actions separate to the policies themselves. A reader may glance at the contents page, look at the summary section and not look at the policy where it sits with the important supporting text. This may cause confusion out of context. You will also see that there are further points raised in our comments that highlights discrepancies. Senior Heritage and Design OfficerWhy in Policy 3 does it state that the design guidance and codes do not apply to development in the Broads Executive Area? It doesn’t say this in the main policy text. | Also raised by the BA – what do the group want to do, LPAs are suggesting removing the policies at the beginning. Policy 3 on page 11 this is an error. | Retention of Policies at the start of the document and move the Community Actions to below the relevant Policy. |
| Paragraph 31 (p.20) | Place Shaping TeamThe third sentence states ‘xx’ where it states ‘… allocated to deliver xx new homes.’ Suggest this reads ‘… allocated to deliver approximately 60 new homes’.Also, we would suggest the final sentence reads, ‘The emerging GNLP also allows for windfall development adjacent to a development boundary or on sites within or adjacent to a group of dwellings, as set out in proposed Policy 7.5.’ | Recommend amending.  |  |
| Policy 1  | Housing Enabling OfficerPlease see comments on Policy 2 and the HNA as this will impact on this policy. | Noted.  |  |
| Paragraph 32 (p.20) | Place Shaping TeamIt is felt the references to the Broadland Local Plan could benefit from further clarification, given the previous explanation of the current Local Plan and the emerging one.For example, ‘The *current* Broadland Local Plan’; ‘Policy 15 – Service Villages *(Joint Core Strategy 2014)’.* Likewise, the final sentence should be ascribed to the JCS. | Noted make the amendment.  |  |
| Policy 2 | Place Shaping TeamAs noted in comments made by our Housing Enabling Officer on the HNA, there is an error on Page 5 (Statement 6 and therefore 7 and later calculations). The statement that 40% of new housing will be Affordable rather than the 33% in JCS or 28% as per the previous SHMA (or reverting back to 33% as per the emerging Local Plan) is incorrect. Whilst this will need updating in the HNA, this will obviously impact on this policy and the supporting text prior to it.Housing Enabling OfficerA 60:40 tenure split is as previously used by Housing Enabling. We note this tenure split will provide at least 10% of overall dwellings for Affordable Home Ownership as per the NPPF. With regard to the suggested 40% of the rented units to be for Social Rent and 20% for Affordable Rent – this is an admirable stance but may prove difficult to deliver (depending on the relevant RP and the funding available at that time for social rent). You may be better stating 60% Affordable Housing for Rent rather than tying yourselves down to specific percentages of the various rent tenures. The same comments are also applicable for the statement 40% Home Ownership (15% Shared Ownership and 25% First Homes). Again this may be too much information – particularly as BDC is at present Policy neutral around First Homes. So the Parish may be tying themselves to delivery of a tenure that developers may not wish to deliver (owing to the administrative burden and additional legal costs placed on ALL parties – not just the LA). Similarly most Registered Providers will be more supportive of delivery of Shared Ownership. So they may not wish to deliver/ take units - particularly on a smaller site- where such a large proportion of Affordable Home Ownership products are proposed as First Homes. So we would suggest they just state 40% for Affordable Home Ownership (AHO) at this time The Local Lettings / eligibility criteria proposed looks to be an amalgamation of the Broadland S106 local connection criteria and an exception site cascade. So we would imagine this local eligibility criteria would work well in ensuring current, former and others with a local connection can return to the Parish – but only for those living in rented accommodation / with family.So we note this stance would exclude any persons wishing to return but living in the matrimonial home – which is being sold due to a relationship breakdown. Presumably the expectation is that they would move in with family first after the family home is sold. But many former residents may not be in this position.  People who have caring responsibilities in the parish – would need to ensure this covers ‘giving or receiving support from family’ such as childcare support for grandparents (so may want to expand or clarify this point) Even though the Broadland S106 local lettings cascade does not suggest timescales we would suggest ‘working in the parish for at least a year’ to ensure consistency  | Consider whether to request the HNA is updated. Broadland are suggesting that if we don’t have the HNA updated, then we can’t substantiate the split requirements in the policy. Or could we take the approach of being less specific as suggested by the housing enabling officer? But this wouldn’t add anything to what’s already in local plan policy. Maybe a conversation with the housing office at the district council would be worthwhile. | No. The HNA is an assessment by AECOM. It isn’t included in the Policy and was not deemed an issue by the group. |
| Paragraph 55 (p.28) | Place Shaping TeamDesign policies within the JCS and within the Broads Local Plan are referenced, but there is no reference to the BDC Design Policy, GC4, within the adopted Development Management Policies DPD. | Noted reference can be made to BDC GC4. |  |
| Policy 3 (p.29) | Place Shaping TeamCriteria (a) of the policy states that the density of development should not exceed 20 dwellings per hectare. The policy does not state whether this is intended to be a gross or net figure, in order to ensure that the policy is clearly written and unambiguous this should be clarified. In addition, GNLP allocation GNLP1001 is allocated at a gross density of 26 dph and allocation GNLP3003 is allocated at a gross density of 23dph. The Council considers that these are reasonable densities that would allow for development appropriate for the area to be brought forward. In this regard the Council notes that the Design Guidance and Codes appears to identify 30 dwellings as being appropriate for the site, consistent with the local plan policy but above the density sought through the Policy 3. More generally, it is somewhat unclear how the 20 dph figure was arrived at within the Design Guidance and Code. Further clarity on this point would be beneficial and would help demonstrate the relationship between the general guidance of development, the guidance for site 1001 in particular, and how the Neighbourhood Plan’s approach will ensure that development makes the optimal use of land in accordance with paragraph 125 of the NPPF.  Whilst we do expect this to have been the intention of the plan, it should be born in mind that the allocations proposed within Reedham form part of the proposed development strategy to meet the strategic policy requirements of the GNLP, and in particular the objectively assessed need for housing. If it is the intention of the neighbourhood plan to restrict the level of development on one or both of these sites, then further evidence should be put forwards to justify why this is proportionate and justified. Senior Design and Heritage OfficerFor point (d) and (h) would suggest saying flint rather than stone and for point (d) would also query why steel is included. As a general point regarding density – if providing a high percentage of affordable housing is desired, a low density may lead to quite a wide disparity within a development of affordable housing being quite dense part of the scheme and private housing being much less dense to balance out the overall density figure. It might be more appropriate to have a more nuanced policy with regard to density rather than having a set figure? Perhaps set out that density can vary across a site within a specified range rather than exact final figure and make sure it is not just the overall density being assessed.Housing Enabling OfficerWe would suggest reference to minimum housing space standards (such as NDSS) – particularly for any affordable units. So as to ensure they will meet the Design and Quality requirements of RP’s operating within Broadland. | Recommend reviewing the policy in relation to 20dph – check what it says in the Design Codes in relation to this. May need to be less specific in criteria a, removing the 20dph requirement. Recommend changes to point d and h as suggestedRecommend including reference to minimum housing space standards. |  |
| Policy 4 (p.31) | Place Shaping TeamIt may be beneficial to provide, at least within supporting text, clarification of what is needed to ensure that any space provided through the development of site GNLP3003 would be deemed “suitable as a school playing field”. For example, is it the neighbourhood plans intention for open space to be provided at the southern end of the site, with footpath access via Holly Farm Road? The latter at least appears to be implied in the opportunities summary within the Design Guidance and Code. If so, it may be beneficial to set this out within the policy.  In regards to criteria (c), it is unclear what the neighbourhood plan policy is seeking to achieve in terms of “off-road access to the site for pedestrians and cycles”. It does not appear practical or feasible to provide pedestrian or cycle access to the site from the surrounding road network. Therefore, it would be beneficial to set out more clearly what the policy is seeking to achieve through this criteria.  It should be noted that the policies of the plan overview at the beginning of the document does not include all of criteria (c) it only states “convenient off-road access”.Senior Design and Heritage OfficerPolicy 4 states that “the development should include provision for sufficient on street visitor parking” ….however the next page states “Generally, on street parking should be avoided in future development” so guidance is a bit contradictory and could be better phrased. Also, it goes on to say well-designed on street parking schemes on through routes will be supported. The following section says on plot parking should be located to side of properties – but then says “if front parking is used..” So this probably needs to be reviewed for clarity. | Group to consider the response and then recommend adding in more clarification into the supporting text.Consider the comments in relation to providing off road pedestrian and cycle route to the development.The Heritage officer has made a valid point. Policy 4 and Policy 5 at the moment do contradict themselves. Policy 5 refers to the design guidance stating there generally shouldn’t be on street parking in future development. Reconsider the wording used in Policy 4 and 5 to ensure it does not contradict. Many of these points reflect the design guidance.  | Clarify by including ‘minimum playing field area for a primary school as per current standards’ and ‘including adequate parking’.Remove reference to on street visitor parking |
| Paras. 64 and 65 (p.31) | Place Shaping TeamReference is made to Policy 4 in each of these paragraphs – believe this should be Policy 5? | Noted. Policy 5 should be referred to instead.  |  |
| Policy 5 (p.31) | Place Shaping TeamThe policy states that “all parking areas and driveways should be designed to improve impervious surfaces such as permeable paving”. This sentence does not appear to make sense. Is the policy intended to say that “all parking areas and driveways should be constructed using permeable paving”? If so would it be better to phrase it in this way? In regards to on-street parking, the guidance appears to go beyond what is set out in the design guidance. Moreover, it is unclear in what circumstances the plan would not expect off-street parking to be provided, or in which cases on-street parking would. To address this, we would recommend the relevant criteria is amended as follows: “*Wherever feasible and practical off-street parking should be provided to meet the needs of new development. The design of roads should make allowances for on-street parking where it is likely to occur. Consideration should be given to whether any on-street parking can be designed to achieve informal traffic calming on through routes”.*  | Agree with the first paragraph- amend the wording. Agree wording needs to be clearer. Consider incorporating the wording proposed. |  |
| Paragraph 75 (p.36) | Place Shaping TeamFinal sentence – there is a reference to ‘Borough Council area’. Suggest this is changed to ‘...either local planning authority area.’ | Recommend changing. |  |
| Policy 6 (p.36) | Place Shaping TeamThe first sentence isn’t really policy wording and, if retained, should form part of the supporting text.The policy could usefully point applicants to relevant sources of environmental data, such as the Norfolk Biodiversity Information Service and the DEFRA Magic mapping service. It is unclear what, if anything, the policy is seeking to achieve beyond the emerging requirements of GNLP policy 3 and the provisions of the Environment Act. Given that the GNLP policy is not yet in place and that the Environment Act is not yet enacted, and may be subject to change, it may nevertheless be legitimate to include a policy to reflect a local ambition. However, if there is, or could be, any local nuance to the implementation of the policy then that would be of benefit. Ecology and Biodiversity OfficerPleased that a minimum 10% BNG is included within the policy. The following are further, positive wildlife interventions that the Neighbourhood Plan group may wish to consider if/when refining this policy as part of an non-exhaustive list of items for developers to consider as a means of delivery BNG: * SuDS which are designed for the benefit of wildlife see <https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf> and to prevent amphibians from being trapped

 * lighting complies with best practice guidelines including: [Guidance Note on Bats and Artificial Lighting](https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349) and <https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>

 * Incorporation of hedgehog gaps beneath garden fences

 * Incorporation of bee bricks in every dwelling

 * With regards to bird boxes, may I suggest 1 bird box per dwelling in line with the new British standard BS 42021:2022, with a preference for swift boxes (there are swifts mapped in Reedham on [Swift Mapper](https://www.swiftmapper.org.uk/))
* FYI, information on conservation covenants was recently published by the government <https://www.gov.uk/guidance/getting-and-using-a-conservation-covenant-agreement>
* Perhaps there is scope to also request installation of water butts and compost bins.
 | Recommend moving the first sentence into the supporting text. Could point applicants to relevant sources in a footnote such as the DEFRA map and NBIS.Consider the list by the biodiversity officer- are there any particular details such as hedgehog gaps and bee bricks the group wish to add to Policy 6? | Add bat boxes, and ‘this list is not exhaustive’. |
| Policy 7 (p.39) | Place Shaping TeamThere appears to be a conflict between criteria (c) and (d) i.e. it is appropriate to extend buildings under criteria (c) but it doesn’t appear that you could provide a larger building as a replacement of an existing building to achieve the same outcome under criteria (d). Based on the 4 areas identified this issue would only appear to apply to the village hall and playing fields. If this interpretation is correct then we would recommend that the policy is revised just to say that extensions, alterations or the replacement of buildings will be acceptable where it does not impact on the openness or reasons for designation of the LGS.  It is also unhelpful, and potentially confusing, to have two a, b and c bullet points under the same policy. Subject to amendments in relation to the above comments, the bullets under the same policy should be redesignated a-g.  The summary of policies in the plan also includes a second criteria d, which does not occur in the policy in the main text. It would be useful to clarify what is intended. In regards to the second criteria d listed, there are some concerns about the justification for its inclusion, which is limited. If it is to be included, at the very least the policy should talk about any “significant” impacts, as opposed to any impacts, the latter of which could include even very minor impacts which appears, at least at face value, to be disproportionate.  | Recommend changing the criteria as suggested with respect to extending/replacement building.Agree on the second point about having two sets of a,b,c points. Make amendment to one of these. The summary of policies in the plan is recommended to be deleted.  |  |
| Paragraph 88 (p.45) | Place Shaping TeamThe wording in the bullet points is a little awkward. Perhaps the first bullet could be re-worded to something like, ‘limitations in the scope of the view from the areas suggested’. The second point could perhaps be re-worded such as, ‘the views only being possible from certain individuals’ properties in the parish and therefore not being of benefit to the wider community.’ | Consider amending.  |  |
| Policy 8 (p.46) | Place Shaping TeamIn order to ensure that the policy is proportionate, the final paragraph of the policy would be better placed to refer to “significantly” adversely affect and any “significant” harm. | Adding in ‘significant’ would weaken the likely policy influence. Would recommend not changing the wording here. | Agreed. |
| Policy 9: Dark Skies (p.49) | Place Shaping TeamSecond paragraph - ‘…all planning consents must respect the following criteria…’. This phrase feels a little awkward. Perhaps rephrase to something like ‘…all planning proposals that incorporate new external lighting must meet the following criteria’. | Recommend the change. |  |
| Policy 10 (p.50) | Place Shaping TeamWe would recommend that the words, “where feasible and practical” should be added at the start of the paragraph. This will help clarify when there are legitimate reasons for a departure from the policy. | Recommend making the change. |  |
| Paragraph 106 (p.53) and Policy 11 (p.54) | Place Shaping TeamParagraph 106 discusses the ‘Broadland Local Plan’ and refers to Policies SP16 and DM7. However, these are within the Broads Local Plan. The relevant policy within the Broadland Development Management Policies document is Policy CSU2 – Loss of community facilities or local services.These references are also made within the text of Policy 11 and will need correcting. In addition, the policy text should highlight which Local Plans each of these policies belongs to. | Noted. Recommend making the changes to the supporting text and policy. |  |
| Policy 12 (p.54) | Place Shaping TeamThe title refers to “provision of new recreational facilities”. However, the policy itself deals with community services and facilities, and indeed commercial uses, in Reedham. For this reason, the title should possibly be amended to better reflect this.Should the first sentence read, ‘Development proposals *which* support the provision of new or *the enhancement of* existing community services and facilities…’?Example (a) within the policy could be made clearer by inserting the following: ‘…for the use of all *which* will, ideally, be centrally located.’What is meant by the term ‘appropriate’? It may be useful to expand on what is meant.In general terms the policy appears to hedge its bets slightly. It may be better to set out that the types of development specified will normally be permitted in relation to a positive criteria as to where this will apply, and thereby limit the application of the policy. This will ensure the policy is unambiguous and that it is evident how a decision maker should react to a development proposal in accordance with paragraph 16(d) of the NPPF.  Assuming we have understood correctly what the community are trying to achieve, it may be better to say “significant weight should be given to the development of additional recreational provision” rather than particular support. This will help the decision maker understand the weight that should be given to such proposals in the planning balance for a particular development proposal.  The policy also talks about “social opportunities”. There does not appear to be any definition of what this means. Clearly some of this can be inferred from, for example, the general thrust of the policy (given a fair reading) or the social objective defined within the NPPF or elsewhere in the development plan document. Nevertheless, it would be within the interests of the neighbourhood plan group to consider clarifying what in particular is meant by this term. This avoids the risk that an inferred meaning given to the policy is different to that intended. Moreover, it would bring the proposal more in line with paragraph 16(d) of the NPPF. Furthermore, we would encourage the neighbourhood plan group to consider either setting out the weight that should be given to such proposals, or to set it out as a positive policy for circumstances in which proposed development should be approved. For example, “proposals for new recreational open space will be permitted where they are: centrally located within or otherwise easily accessible from the existing settlement of Reedham; and/or, would effectively provide open space that could be used by Reedham Primary School”.  | Group to consider the points raised.The first sentence could be reworded with the LPA suggestion. 1. Recommend adding the word ‘which’

Appropriate would mean the relevant proposals which would provide new recreational/social facilities for all such as the examples proposed.  | Amendment to Community Facilities approved. |
| Policy 13 (p.55) | Place Shaping TeamWe would echo the comments made by the Broads Authority. There may be some confusion here in terms of the Use Classes. Despite the policy examples of offices or a nursery, Use Class E could include retail, food and drink premises, sports facilities, medical/health services. It also includes industrial processes (E[g][iii]), which the policy does not support.Accepting that some clarification is provided in the second paragraph, it would be helpful if the policy was clearer about what the “certain types of commercial and community uses” the policy would support, this could be in relation to specific types of uses or, probably more sensibly, their characteristics e.g. where the use can be carried out without causing detriment to the amenities of the area and where any impacts on the transport network or on highway safety can be mitigated to an acceptable degree. | Group to consider further what commercial/community uses would be acceptable here so the policy can be more specific. Or specify if there were to be industrial processes, these would only be supported in particular areas. BA also made comments about this policy which are similar. | The Policy will be reworded to focus on the impacts of any change of use. |
| Paragraph 120 (p.60) | Place Shaping Team‘…comments suggesting the number of children who walk and cycle to school should be encouraged… - I’m not sure this phrase makes sense. Should this state, ‘comments suggesting that more children could be encouraged to walk and cycle to school’? | Recommend rephrasing the sentence.  |  |
| Paragraph 121 (p.60) | Place Shaping TeamThe first sentence is quite lengthy and could be made clearer if it was broken into separate sentences, perhaps with a full stop before ‘Primary Schools car parking’?Also, there is a typo in the final sentence – ‘…there is currently no mention *of* the requirement *for* a school travel plan.’ | Noted. Recommend making the changes. |  |
| Paragraph 122 (p.60) | Place Shaping Team2nd sentence – ‘Whereby communications will tackle different options…’ This sentence is clunky and doesn’t really make much sense. Suggest re-phrase. | Recommend rephrasing.  |  |
| Policy 14 (p.60) | Place Shaping TeamWhilst including issues related to Reedham Primary School, the policy appears to go beyond this immediate issue and tackle other car parking issues faced by the village. Therefore, it would appear that the title of the policy should be revised or expanded to reflect the whole purpose of the policy.  More specifically, as written the policy would appear to support any development proposal that includes (potentially as part of a wider development) proposals to improve or expand parking provision for the Primary School or aid car parking issues.  Rather than entangle the policy with other development, would it be better to say that: *Development proposals for the improvement or expansion of parking provision for Reedham Primary School or to improve existing car parking issues faced by the village should be approved where they (for example) are consistent with the Reedham Design Guidance and Code, can be carried out without causing significant detriment to the amenities of the area, and where any resultant impacts on the transport network or on highway safety can be mitigated to an acceptable degree.*  This would still carry weight in determining wider development proposals with such provision but would not get caught up in lending support to what are potentially unknown “enabling” development proposals. I am not sure that the second paragraph is a planning policy. A policy cannot add an extra layer of consultation into the application process, as a statutory requirement Proposals for the parish council to work proactively with developers should probably be set out in a community action policy rather than a planning policy. If to be included in planning policy it should be phrased along the lines that “*Where a proposal relates to the provision of parking and/or drop off provision for the Primary school, development proposals should demonstrate a clear understanding of local highway safety issues, how the proposal would help overcome these issues and how the proposal will meet the need for the size and number of parking spaces and or drop-off facilities required to meet the needs of the primary school.”*The advice of the highway authority should be taken into account in respect of the final paragraph of the policy. | Recommend changing the policy title as suggested. Group to consider recommended wording. The second para if not to be rewording could be added to community action 4 and rephrased if necessary.  | Agreed. |
| Paragraph 127 (p.63) | Place Shaping TeamThere is a reference to relevant historic environment policies in the Broads Plan and the emerging GNLP. However, there is no reference to Policy 2 of the JCS and Policy EN2 of the Broadland DMDPD. | Noted refer to Policy 2 of JCS and EN2 of the DMDPD. |  |
| Policy 15 (p.68) | Place Shaping TeamTypo – ‘Proposals that are adjacent *to* non-designated assets…’The final paragraph should refer to preserving the heritage asset, its distinctive historic features **and its setting**? Senior Heritage and Design OfficerWould suggest that this may need to be separated into two parts – development that directly affecting the NDHA e.g. extensions where the character should be preserved, and development within the setting that needs to take into account the impact on the significance of the heritage asset (see Para 203 of NPPF). | Amend the typo. Heritage officer from Broads Authority recommended a change to the wording with respect to development adjacent. This needs to be considered further.  |  |
| Monitoring (p.69) | Place Shaping TeamThis section is useful, particularly the reference to the Locality monitoring spreadsheet. However, there is no mention of the possibility of a future review of the Neighbourhood Plan. Local Plans are reviewed every five years, and no doubt the Parish Council would not want the NP to become out of date because of new evidence that has emerged in the meantime or because of new Local Plan policies. Therefore, in addition to monitoring how policies within the NP are used by the local planning authority, there is also a role for the parish in monitoring the relevance of individual policies and how up-to-date they are, in light of any new issues, legislation, or Local Plan reviews. This may trigger the need for a Neighbourhood Plan update. As an example (which may be worth referencing), future planning reforms are expected through the Levelling Up and Regeneration Bill and this may well have an impact on what is possible with future Neighbourhood Plans.In addition, there is no summary here of the Community Actions that are listed throughout the Plan. To aid in their implementation, it would be useful for them to be included within a summary action plan, which discusses priorities, partner involvement and resourcing (potentially through parish CIL contributions, s106 and/or other external funding).Therefore, rather than the title purely restricting the scope of this section to ‘monitoring’, we feel it could usefully encapsulate ‘monitoring, review and implementation’. | These comments are useful and will be considered. Worth the group considering renaming the title of the section.Recommend this section referring to the possibility of having a future review of the NP if policies become out of date after adoption.Does the group agree to including the community actions in this section and having an action plan to discuss priorities for this?  | Agreed. |

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| **Section** | **Response** | **Reedham Neighbourhood Plan group response (CCP)** | **Reedham Neighbourhood Plan Group agreed response** |
| LGS Assessment  | Place Shaping TeamParagraph 11 (pg.4) - There is no corresponding footnote to the number used in this paragraph. LGS1 – As this site is leased from the Diocese of Norwich, please can you confirm if they have been consulted on this proposal?  | CCP will look into this and make amendments. Can the PC confirm this? | Yes. A letter was sent which the Diocese passed to the Church Council for comment (none given), but no feedback from that was received. |
| Important Views Assessment | Place Shaping TeamFigure 1 is missing number 10 from the key.View 7 includes a private grassed area – can this be included? There is an issue with the formatting for view 3 that needs to be rectified. | CCP will make the necessary amendments. Include a photo of the private grassed area.  | Agreed. |
| Housing Needs Assessment | Housing Enabling OfficerPage 5 (Statement 6 and therefore 7 and later calculations) state that 40% of new housing will be Affordable rather than the 33% in JCS or 28% as per the previous SHMA (or reverting back to 33% as per the emerging Local Plan). It seems that the figure may have been taken from the Affordable Housing supplementary planning document, some elements of which are now out of date. We have not had 40% AH since the JCS (Policy 4) was adopted in 2014. This will mean any calculations within the HNA will need to be updated, as will the relevant planning policies in the main NP.  | For discussion at the meeting. AECOM were commissioned to deliver the HNA and sent over the final signed off version from Locality. For amendments to be made now a new request will need to be made to locality.  | As per Policy 2, the HNA was an independent assessment by AECOM and no change was deemed necessary. |
| Design Guide | Senior Heritage and Design OfficerThe footpath map on p15 is missing FP17 which is quite a key route to the school P15 – could mention that this is the only road crossing on the Yare between Norwich and Yarmouth. This is mentioned on p16 in the landscape character and wildlife section but might be better on p15. Also the Wherryman’s Way is a significant county footpath/trail through the area. This is also mentioned on p20 but it seems right to include it on the footpath map in this section. P16 There is quite a lot of history of grazing on the marshes and associated farming which could be mentioned – the section seems to be wildlife orientated but there is ‘way of life’ in farming practices and some barns were specifically designed for stock grazing on the marshes. P29 – if cul-de-sacs are private drives then it is better to separate footpaths.  P30 – there is a statement that says there should not be 3+ terraces as it does not reflect the character of Reedham – however photo top right shows a terrace of six houses - so the guidance appears contradictory – even though this is the only longer terrace in the settlement. P31 – it should say low flint walls and not refer to them as stone to avoid misinterpretation. P32 – I would suggest adding the following to the sixth bullet point. “The use of flint, timber and weatherboarding, normally as a secondary material, to add distinctive features to buildings is preferred;” There does not seem to be much detail on achieving tenure blind or integrated development – particularly as there is quite a high proportion wanted to be achieved for affordable housing, so you might want to consider this further.  | Has the final version now been issued or is it possible to still make changes?  | The final version has been issued. It was acknowledged to be an imperfect document but there were only so many times one could request the same amendments… |