**Reedham Neighbourhood Plan Summary of Regulation 14 Responses**

## Statutory Stakeholders

**Broads Authority**

| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
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| **Summary of response** - The Plan is welcomed. The comments relate to clarification mainly, but Policy 14 seems contrary to the NPPF.  | Noted. See below for policy 14.  |
| Do the images have alt text for screen reading and accessibility purposes?  | Yes, we will do another accessibility check on the next set of documents. |
| * Para 12 – ‘Local Plan**s**’
* Para 16 ‘In the emerging **Greater Norwich** Local Plan…’
* Para 29 – ‘Local Plan**s**’
 | Make amendments  |
| Page 11 to 20 – there is no need to repeat the policies here. It adds ten pages to the document and without their supporting text, they will be read without the necessary context. Perhaps list the names of the policies and their page numbers, but I don’t think you should repeat the policies. Also makes it difficult if you make a change to a policy in one place and then forget to make the change in the other.  | Group to consider this feedback, same from BDC. *Noted but leave as is. The group wants the policies to be easily accessible and easy to find.* |
| Para 35 – policy 5 of which document? | Review and update text.  |
| * More 2021 Census information is released now and there may be some data relating to the Plan, rather than relying on the 2011 Census.
* Some pieces of data are from 2021 and it is now 2023.
 | Update all with what is available, but Census 2021 data at a parish level has not got a specific release data yet when we asked the ONS Census customer service team in April 2023, so accurate figures at a parish level for 2021 cannot be confirmed as of yet.  |
| Figure 10 says the date of the data is 2020, yet Policy 2 says the document’s date was 2022. Can the dates be clarified?  | Review this.  |
| **Policy 2:*** what is the reason for excluding conversions from this policy requirement?
* by saying ‘3 bedrooms or fewer’, I would suggest the developer will go for three bedrooms. Yet your data indicates more new housing should be 2 bed rather than 3 bed. To me, as written, I don’t think the policy represents the evidence. You may want to check and maybe explain things a bit more?
 | Discuss this with the steering group*Conversions are usually to make a building bigger and this policy is for new buildings.**The HNA identifies the need for 2 beds therefore developers will have to have due regard to this and provide.* ***CCP*** *to amend the supporting text to explain this more.* |
| * Para 52 – perhaps say, maybe in a footnote, that the BA have regard to/defer to the thresholds and standards of the relevant district, although do seek off site contributions for schemes of 6-9 dwellings.
* Para 53 – suggest a footnote that says First Homes cannot come forward in the BA Executive Area.
 | Noted – make changes. |
| **Policy 4:*** says this applies to all new development – so schemes like new windows or signs? You may want to check the threshold for this policy.
* Policy 4 f – says ‘improve net gain’ – would ‘provide net gain’ be better?
 | Change wording to all new built developmentupdate 4f.  |
| * Para 67, last sentence – if this is the Greater Norwich Local Plan, suggest you say that.
* Para 70 – says ‘the Local Plan’ – which one? Or should it be ‘plan**s**’?
 | Amend and review wording  |
| **Policy 6 –** last few words – when you say deep, do you mean under the ground? You might want to check what you mean/write.  | Review wording. Amend if necessary. |
| **Policy 7:*** the Examiner removed the BNG 10% requirement from Hemsby Neighbourhood Plan – you may wish to look into that and see if you need to change your policy if you wish the standard to remain. Equally, BNG standard of 10% has remained in some other made Neighbourhood Plans.
* how did you want people to show BNG of 10%? Using the most up to date Metric? Did you want to say that?
* Para 81 – BNG will be a requirement from November 2023, although small sites has been delayed until April 2024.
 | Retain the 10% BNG requirement, to be determined by the examiner. Add in reference to the most up to date metric.Update para 81 |
| Para 102 – says ‘there’s a probably of 1 in 1000 of flooding’ – probability  | Make the change.  |
| **Policy 14:*** promoting town centre uses in redundant farm buildings appears contrary to the NPPF and local policy. Para 87 for example of the NPPF says town centre uses should be in the town centre. And then the glossary on page 68 says what a town centre use is and that list is very similar to Class E uses. I would suggest that this policy needs to be checked for consistency with local and national policy as it seems contrary to it at the moment.
* the first sentence says that extensions to redundant farm buildings will be looked on favourably, but shouldn’t that refer to being subject to other development plan policies as perhaps the design and impact on landscape as well as works and impact on, say, roosting bats all are important considerations.
 | Review with the group.*The NPPF policy is mainly around scale. It was agreed to add “except where there is a main town centre use.”* |
| **Policy 15:*** you mention in the text the issue of a lack of standard for cycle parking for pupils – do you want to address that so that any development at the school needs to ensure cycle spaces for pupils?
* you don’t mention scooting in any of the policy or supporting text – lots of children scoot to school and as such, do you need to have mention of the need for scooter parking?
* I read the policy and it is mostly about finding extra cycle provision for the school, with one small line about elsewhere in Reedham. I wonder if this policy is really clear in to what and where is applies?
 | Group discussion – did you want to add in something about cycle parking provision at the school? *No*Recommend adding scooting *The group did not feel this was necessary*Recommend amending the title of this policy so that it’s specifically about the primary school & parking. *This was agreed* |
| **Community Action 4** – it sounds like a school travel plan needs to be produced or if there is one, improved and implemented. Should the Community Action refer to school travel plans?  | Mention school travel plan within the action. *It was agreed to keep this as is* |
| **SEA and HRA*** This document quotes data from the evidence base – some evidence is a few years old now and should be updated.
 | Noted. Will update the data where possible.  |
| **Design Code:*** Do the images have alt text for screen reading and accessibility purposes?
* Section 4.6 onwards seem to be relevant to all development in the Broads, but is under the chapter that starts only talking about the two allocated sites. You may need to make it clear which bits are relevant to the entire Reedham area and which bits are only relevant to the allocated sites
 | This document was signed off by AECOM so we can not make specific changes.  |
| **Evidence Base:**·         The document is dated 2022. I would suggest it needs updating for the next version. ·         For example, more 2021 Census information is released now and there may be some data relating to the Plan, rather than relying on the 2011 Census. ·         Other pieces of data are from 2021 and it is now 2023. ·         Did you want to include parts of the emerging Greater Norwich Local Plan as well as the 2015 plan?  ·         Do you need an OS Copywrite for the maps? ·         Do the images have alt text for screen reading and accessibility purposes?  | Noted. Will update the data where possible in the document. However, at a parish level Census 2021 is not available and when contacting the Census team last month on this query they said this data will not be available until late 2023. Yes, an OS copyright is needed for the maps and a license number is obtained. Will double check this is sourced on all maps.The images have been checked for accessibility and will be checked again.  |

**Broadland District Council**

| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
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| Please make sure that all photos/graphics/charts and diagrams all have appropriate titles and cite the source. Please also check that all of the documents meet the accessibility guidelines.  | Check all of these.  |
| Figure 2 (p.5)- Suggest the caption reads ‘Reedham Site Allocations in the submitted GNLP (2020) | Amend.  |
| Paragraph 30 (pg.11 -19)- It 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. | For discussion. *As per feedback from the BA, this will be left as is so the policies can easily be found in one place* |
| **Policy 1:** Notes the additional policy Reedham Village Gap. * The defacto intent of the policy is to prevent any future development on Middle Field.
* It would be useful to explain why this site hasn’t been considered or proposed as a LGS given the clear intention to substantively restrict development on this land?
* The policy as written appears more restrictive than a LGS as it would not benefit from exceptions. Such high-level restriction should require very strong justification which the BDC cannot see currently exists.
* As set out in paragraph 101 of the NPPF, if it were considered as a local green space, it would be necessary to be able to show that the designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services. The Council considers justification that considers these specific issues should be demonstrated to justify the policy.
* there appears to be no proportionate assessment of whether it is actually necessary to designate the whole area or provide the very high levels of protection set out in the policy.
* consideration should be given to whether restriction of all types of development is necessary within the area- such consideration could be taken into account with regard to the meaning of development.
 | For discussion – in terms of the size and intent of the policy. Recommend amending the second para to ‘development proposals that would unacceptably detract from the open character of the gap or reduces the separation between the two parts of the village will not be supported’. This wording has just been agreed by the examiner of the DDNP, which has a policy protecting the gap between Diss and Roydon. *The group discussed this in conjunction with a letter received from Savills on behalf of CM stating a very similar argument.* ***CCP*** *will amend the policy to be a specific policy about Middle Field and will be re-written to include development would be allowed for priority use for a school, playing field or village hall, for the life of the plan, possibly with some enabling development. Basically development for community use would be acceptable.* |
| Para- 32 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 amendment. |
| Policy 2: Please see comments on Policy 3 and the HNA as this will impact on this policy | Review policy and consider how the policy 3 comments affect this?  |
| Para 35-The sentence doesn’t read correctly. We would recommend changing this to “The emerging GNLP Policy 5 requires 33% affordable on sites of at least 10 dwellings or 0.5Ha in size” | Noted make amendment. |
| **Policy 3 (pg.29):*** Regarding the 60:40 split it may be better to state 60% affordable housing rent rather than specifying % for social rent (40%) and affordable rent (20%).
* Same regards to 40% home ownership (15% shared ownership and 25% first homes) may be too specific - 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.)
* The Local Lettings / eligibility criteria proposed looks to be an amalgamation of the Broadland S106 local connection criteria and an exception site cascade. The local eligibility criteria would work well in ensuring current, former and others with a local connection can return to the Parish –but only work well with those living in rented accommodation or with family. It would exclude any persons wishing to return but living in the matrimonial home which is being sold due to a relationship breakdown.
* Caring responsibilities 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)
* Local eligibility criteria-suggest ‘working in the parish for at least a year’ to ensure consistency.
 | For discussion. The policy could just specify 60% affordable rent, 40% affordable home ownership. *Agreed. To be clarified in the supporting text.*Further discussion about the local eligibility criteria. *Including those wanting to return after a relationship breakdown is too picky/complicated. But it was agreed to add ‘working in the parish for at least a year’.* |
| **Policy 4:** * Recommend 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
* Design codes and checklist (appendix c)- concern this is too detailed for the scale of development likely to come forward and add a disproportionate requirement into the process that doesn’t appear to be justified. Recommend the second paragraph of the policy should be re-worded to state that applicants should take account of the Design Codes and the Checklist in formulating their proposals.
 | Make reference to the NDSS in BroadlandReword that the checklist should be used. |
| **Policy 5:** Previous comments on the draft plan still apply regarding criteria c and being clearer on what the policy is seeking to achieve here with regard to off road access. Whilst the BDC welcome the additional wording the BDC recommends that the plan provides information on:* what the national space standards are, and evidence is referenced.
* clarify whether the plan expects the site to meet these standards irrespective of any changes to such guidance or if the policy just expects the site to meet the prevailing national standards (whatever they may be) at the time a planning permission is granted.
 | For discussion – can we add further detail with respect to what is meant by off road access. On the draft plan BDC indicated they felt this would not be possible to achieve. Add further detail on the national space standards as suggested. *It was agreed the supporting text would include that it is up to the developer to show what is or isn’t possible.* |
| **Para 70-** Reference is made to Policy 5 in this paragraph – believe this should be Policy 6? | Review this and amend if needed. |
| **Policy 6:** The policy states that “all parking areas and driveways should be constructed using impervious surfaces such as permeable paving”. This sentence does not appear to make sense.Permeable paving is not an example of an impervious surface. 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? | Amend the wording  |
| **Policy 7:*** The policy could point applicants to relevant sources of environmental data such as the Norfolk Biodiversity Information Service and DEFRA mapping service.
* It is unclear what the policy is seeking to achieve beyond the emerging requirements of the GNLP Policy 3 and 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 officer welcomes mention of a minimum of 10% BNG
* Examples of positive wildlife interventions the NP group can consider when refining the policy have been included as a means of delivery to BNG including:
1. 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
2. lighting complies with best practice guidelines including: Guidance Note on Bats and Artificial Lighting and <https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>
3. Incorporation of hedgehog gaps beneath garden fences
4. Incorporation of bee bricks in every dwelling 6 Section Response
5. 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)
6. FYI, information on conservation covenants was recently published by the government <https://www.gov.uk/guidance/getting-and-using-a-conservation-covenant-agreement>
7. Perhaps there is scope to also request installation of water butts and compost bins.
* Green Infrastructure Officer stated there could be more consideration given to the inclusion of GI elements in Policy 7. The officer mentioned how Reedham has the potential for many GI links to the Wherrymans Way Long Distance Trail, the Broads and to include permissive paths to improve walking connectivity. Also, reference could be made to the East Broadland GI Project Plan and in particular Project 4, which includes Reedham.
* GI officer also mentioned how it would be sensible to consider how people can access the important habitat around the parish (SSSIs, SPAS, SACS) or how the parish could help provide alternative routes to alleviate pressure on the Broads.
 | Include reference to relevant sources recommended by the place shaping team and ecology and biodiversity officer. The key areas of local difference with this policy relate to BNG being delivered within the parish boundary where not possible on site, and recommendation in relation to enhancing etc. green infrastructure, priority habitats within the parish. Incorporate suggestions from the biodiversity officer, in the policy and supporting text, wherever appropriate. Incorporate suggestion with regard to GI infrastructure into the policy.  |
| **Policy 8:** BDCpreviously commented that having lists using the same numbering convention is potentially confusing under the same policy. Subject to amendments in relation to the above comments. Whilst there is now numbers and letters, the numbers seem illogical (5-8) and do not match the numbering of the sites in Fig.14 | Update numbering/lists.  |
| **Para 95**- The 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.’ | Update the wording.  |
| **Policy 9:** In 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. | Update the wording.  |
| **Policy 10:** Avoiding light spill from internal lighting will be difficult to enforce, given that householders may choose lighting sources and placement within their own homes. BDC suggest this final paragraph is revised and, in terms of the aspiration to avoid disturbance to wildlife, the Dark Skies policy within the recently adopted Tivetshalls Neighbourhood Plan might provide a useful reference for the steering group.  | Add this? Tivetshall’s NP sets out ‘Proposals including prominent lighting visible from the surrounding landscape will not be supported, unless it can be demonstrated that such lighting is required in the interests of safety and security. Proposals including lighting likely to cause disturbance or risk to wildlife should seek to mitigate such disturbance or risk.’ *It was agreed to include the above wording.* |
| **Policy 13:** * 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.
* It may be better to set outthat 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.
* 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.
* It would be in the interest of the NP group to define what is meant by social opportunities to give clarity on the term to avoid risk that an inferred meaning given to the policy is different to that intended.
* BDC encourage the NP group to set out the weight given to such proposals or to set out a positive policy for circumstances in which proposed development should be approved. E.g. *“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”*
 | Update aWhat do the group consider by the term appropriate, so this is addressed? *It was agreed to add ‘for a rural setting/area’ as clarification.*Update the criteria so reflected positively as suggested. Include significant weight within the policy.Give some examples of social opportunities. *Clarification to ‘opportunities for social interaction’.*Update the policy as suggested in final bullet point. |
| **Policy 14:** Whilst some changes have been made from previous comments on the draft plan there may still be confusion in terms of the Use Classes.The BDC accepts some clarification is provided in the second paragraph. However, 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. | For discussion. Are we able to be clearer on the types of development that would be acceptable. *It was agreed to amend to facilities suitable for a rural area.* |
| **Policy 15:** The BDC note that the NDP incorporated the suggested text regarding the parking provision from previous comments. However, the NP still has left the first paragraph which appears 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. The BDC would still recommend separating these elements so as this policy does not get caught up in lending support to what are potentially unknown “enabling” development proposals.The advice of the highway authority should be considered in respect of the final paragraph of the policy. | Add in terminology, subject to meeting other policies in the development plan. Separate the elements of the policy as suggested.  |
| **Policy 16:**Heritage and Design Officer suggests that Policy 16 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).Regarding the NDHA assessment and landmark status category. The heritage officer notes that the landmarks box has not been ticked even though some of the identified NDHAS arguably have strong communal or historic associations e.g., school, railway station, the chapel and American war memorial.  | Separate Policy 16 into two parts regarding development directly affecting the NDHA.Recommend amending the NDHA to reflect the comments around the landmark status.  |
| **LGS Assessment:** * Paragraph 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?
 | Review para 11. What date was the Diocese contacted – did they respond? *The Diocese was included with all other statutory consultees in the email at the end of March 2023. They did not respond directly to the Clerk but did ask the Church for their opinion.* |
| **Important Views Assessment:** View 7 includes a private grassed area – can this be included? | Just confirm that this view can be seen from a publicly accessible place. *This was confirmed.**Descriptions and numberings need to be amended to be consistent. The owners of Quay Terrace requested all descriptions be Private Garden in front of Quay Terrace.* |
| **Housing Needs Assessment** These comments were made previously on the draft document but do not appear to have been updated for Regulation 14 so are being submitted again. Housing Enabling Officer Page 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. | Note the comments. However, the HNA was provided by an external consultant, AECOM, and this final document has already been signed off and completed so we cannot influence editing this at this stage.  |
| **Design Guide:** These comments were made previously on the draft document but do not appear to have been updated for Regulation 14 so are being submitted again. Senior Heritage and Design Officer* The 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. 10 Section Response 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.
 | Note the comments. However, the Design Codes document was developed by AECOM and this final document has already been signed off and completed so we cannot influence editing this at this stage.  |

**Norfolk County Council**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Ecology**  |  |
| **Visions and objectives:** Objective B strongly supported. | Welcome the support |
| **Policy 7:** Supported however item b wording may be too restrictive since it could not be guaranteed that registered net gain providers would be available within the parish boundary. Recommend changing this to: *Delivery of biodiversity net gain on site wherever possible and if it can be demonstrated that this is not feasible then delivery elsewhere in the Parish boundary or suitable available locations in the local area* | Update |
| **Para 81-** This could be updated to:*Mandatory BNG is expected to come into force from November 2023, with secondary legislation and detail due by summer 2023.* | Update |
| **Community Action 1: Strongly supported** | Welcome the support |
| **Lead Local Flood Authority**  |  |
| LLFA welcomes reference to various sources of surface water and fluvial flooding. However, there is no reference to groundwater flooding. Policy 11 and the supporting text and Community Action 2 could have particular relevance to this.  | Add in more detail in the appropriate places regarding groundwater flooding. |
| LLFA welcomes:* the inclusion of Objective H within the vision and objectives
* consideration to flooding in Policy 4 supporting text and the design guidance checklist within Appendix C
* reference made to sustainable drainage within the flood and surface water management section.
* reference to the Greater Norwich SFRA Final Report Level 1 2017
* recognition of Para 102 and that flooding can cause serious damage/impact
* reference made in the NP supporting the delivery of the strategic policies contained in the NPPF and Local Plans.
* the inclusion of community action 2 and being proactive with appropriate stakeholders.
 | Noted. |
| LLFA recommends that a full review of flooding within the Parish should be carried out to assess all forms of flood risk in the area, including flood risk from surface water, groundwater, and ordinary watercourses, supported by relevant mapping. | Noted will look into updating the NDP and evidence base including mapping. Also include detail where necessary given in the full representation around datasets/guidance.  |
| Recommend Policy 11 is strengthened and makes reference to all sources of flooding including the four pillars of SuDS and set out the role that sustainable drainage systems can play in contributing towards other benefits such as sustainable development and wildlife. | Add into supporting text.  |
| The LLFA also note that large areas of the Parish lie within Internal Drainage Board Areas, namely the Waveney Lower Yare and Lothingland IDB, The Broads IDB, with Reedham also lying on the north bank of the River Yare (Environment Agency main river) with parts of the Parish located within Flood Zones 2 and 3. Recommend adding in reference to the IDB areas within the NDP and mapping on this matter.  | Include within the plan.  |
| * Recommends inclusion of EA flood mapping for surface water flooding and surface water flowpaths
* Recommends the most up to date version of the NCC LLFA Statutory consultee for planning guidance document at time of adoption - [Information for developers - Norfolk County Council](https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers)
 | Include within the plan.  |
| **Community Action 2** - The LLFA comments that whilst the LLFA have powers to enforce maintenance on ordinary watercourses that are not within Environment Agency or IDB areas, the LLFA do not have any responsibility for maintenance these watercourses. This is the responsibility of riparian owners. Where there is evidence that a lack of maintenance is causing flooding that meets LLFA impact thresholds the LLFA will seek to resolve the situation by means of negotiation with the person responsible | Noted. |
| **No comments were left in the representation from the NCC Historic Environment Team.** | N/A |

**Anglian Water**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Policy 6:** Welcome the policy requirements for all parking areas and driveways to be constructed using permeable paving to minimise surface water runoff. We suggest that the sentence is amended to remove the word ‘impervious’ as this suggests the surface should be impermeable rather than permeable. Suggested change: All parking areas and driveways should be constructed using i~~mpervious~~ permeable surfaces ~~such as permeable paving~~ to minimise surface water runoff. | Noted and recommend making the change.  |
| **Policy 8:** AW assets are located within or close to the boundaries for sites LGS2, 3, and 4. Policy considered adequate to enable AW to access infrastructure where required, eg for maintenance and repairs.  | Noted |
| **Policy 11:** Supports the aim of the policy to minimise the risk of surface water flooding through the use of SuDS. The policy or supporting textcould:* Refer to the surface water drainage hierarchy with infiltration on site as the preferred disposal option, followed by discharge to a suitable watercourse and then connection to a sewer.
* Refer to the Government’s intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024.
* Mention that AW requires any connections for surface water to be modelled to assess whether there is capacity in our network to accept the flows and any upgrades that may be required are at the developer's expense.
 | Noted and recommend referring to these points in the supporting text where appropriate.  |
| **Community Action 3:** Note the Parish Council’s intention to work with Anglian Water to improve the maintenance of the sewerage system in Reedham. AW welcome engagement to discuss any concerns the Parish Council and wider community may have with the network. | Noted and welcome engagement.  |
| Overall comments: Anglian Water is supportive of the aims of the Reedham Neighbourhood Plan subject to the clarifications highlighted. | Noted will take these points on board. |

**National Gas Transmission**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • <https://www.nationalgas.com/land-and-assets/network-route-maps>  | Noted. |

**National Grid**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| An assessment has been carried out with respect to NGET’s assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that it has no record of such assets within the Neighbourhood Plan area.  | Noted. |

**National Highways**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| No comment | Noted |

**NHS- Norfolk and Waveney (on behalf of Norfolk and Waveney ICS, incorporating Norfolk & Waveney Integrated Care Board (ICB), Norfolk Community Health and Care (NCHC), Norfolk & Norwich University Hospital NHS Foundation Trust, Norfolk and Suffolk NHS Foundation Trust and the East of England Ambulance Service NHS Trust (EEAST))**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Comments on existing healthcare position proximate to the development plan area:** The provision of healthcare services is currently serviced by Acle Medical Partnership, Reedham Branch. In terms of premises space, the demand and capacity data indicate that this practice is marginally constrained and the majority of residents within the Reedham neighbourhood plan boundary from new developments, will be expected to register and visit a local GP. In terms of limited premises space, and with the addition of new developments in and around the area in the near future, capacity issues have potential to arise.The Primary Care Network are looking at ways to better integrate community teams with primary care provision. | Add to the supporting text.  |
| Welcomes the inclusion of the objective “Protect and enhance important community facilities including recreational opportunities that are accessible to all ages” | Noted and welcome the support. |
| Supportive of **Policy 12** and welcomes the inclusion of the local doctor’s surgery designated as a community facility for protection. | Noted and welcome the support. |
| Para 13 refers to Reedham as an appropriate area for limited growth. The local GP practice is constrained, and any further growth would place additional pressures on their services which could have an impact on the local residents.The ICS would welcome acknowledgement that to protect and maintain a sustainable healthcare service in the area, contributions via the local parish CIL funding may be required for reconfiguration or extension of local healthcare facilities to manage the additional impacts in the future.The ICS would welcome the addition of a simple statement to confirm that Reedham Parish Council will support the ICS for the residents of Reedham through the utilisation of local CIL. | Noted comments on the GP being constrained. Recommend adding to the plan reference to the PC being supportive of the ICS receiving funding through CIL contributions where feasible to support sustainable provision of local healthcare facilities in Reedham. See comment relating to CIL, what do the group think?  |

**Water Management Alliance**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| Reedham falls partially within parts of the Internal Drainage Districts (IDD) of the Broads Internal Drainage Board (IDB) and the Waveney, Lower Yare and Lothingland IDB, members of the WMA. Therefore, the Board’s Byelaws apply to any development within a Board’s area. | Noted |
| Two sites have been allocated in the GNLP - whilst sites have not been allocated within the Reedham neighbourhood plan, in order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes, please be aware of the following where developments are proposed within or partially within the Board’s IDD:* Byelaw 3, Byelaw 4, Byelaw 10, Byelaw 17 and S.23 of the Land Drainage Act 1991

Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application. | Noted will keep advice in mind offered by the WMA. |
| **Policy 11**: Welcome the inclusion of SuDs  | Noted and welcome the supportive comment. |
| **Community Action 2:** Welcome the PC working with appropriate bodies to ensure maintenance of watercourses particularly LLFA**.**Recommendincluding reference to the Internal Drainage Boards specifically as regulators of riparian watercourses within their districts. This is because works to watercourses (such as surface water discharges and/or any alterations of said watercourses) will require consent from the relevant regulatory body (the Board where within an IDB district) therefore it would be beneficial for the Boards to be included in the plan. | Noted and recommend including reference to the IDBS in community action 2. |

**Freethorpe Parish Council**

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| **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| Parish Council supported and admired the plan. No adverse impacts on Freethorpe parish were identified.  | Welcome the comments.  |

**Residents/ Online Survey Consultees -** Number of responses were 13 in total via the online survey.

**Housing**

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| **Section of the online survey** | **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Housing policies**  | Strong support for policies, particularly Policy 1, 2 and 6. There were 6 comments left regarding the housing policies. These included: * Overall additional housing should be supported by additional infrastructure including medical, educational, and utility services.
* Any development coming forward should undergo rigorous assessment to establish existing infrastructure can cope with additional demands.
* The NP should reference that Reedham is within a Nutrient Neutrality Zone with regard to housing development needing to deliver efficient and effective NN mitigation
* Disappointing in the design section that Barn Owl Close is an example of new development design due to the poor landscaping, hard engineering, and intrusive features.
* Concern that Mill Road Site density is too high and in excess of the 10-20 range indicated for each site at point 13 of P4 under neighbourhood planning.
* 30 dwellings seems unnecessary at either of the proposed sites indicated in the GNLP since 24 dwellings have been delivered on the Station Road site (Barn Own Close).
 | Welcome overall agreement and note the comments raised by residents/consultees. Regarding the GNLP sites these are established in the Local Plan, outside of the NP influence, so these figures cannot be changed in the NP. Reference in the supporting text where appropriate can be made for NN update in the area and developers/applicants will be aware of requirements expected for areas falling in the NN catchment.  |

**Natural Environment**

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| **Section of the online survey** | **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Natural Environment Policies**  | Policy 7 to Policy 11 overall had agreement or strong agreement from the online respondents. There was one strong disagreement on Policy 8 (LGS) and this links to the objection of a landowner not wishing for their private garden at Quay Terrace being designated. A few comments left about this LGS included:* that the area was privately owned
* people already fail to respect this area as private property
* there is a covenant in existence to prevent inappropriate development already
* the title for this LGS should be changed if this stays in to state the area is ‘private’.
* Figure 14 should be amended to show Quay Terrace extending to the slipway.

One comment noted that page 45 needs to be amended with the correct listing of green spaces reading 1 to 4 not 5 to 8. Another comment on green spaces is the loss of these to any size of development will be detrimental to the area.For the biodiversity policy it was suggested that the reinstatement of farmland invertebrate strips would significantly help biodiversity whilst providing local amenity. For the dark skies policy, it was considered that controlling new development is essential but retrofitting external lights can be a problem for households and businesses since older fittings are replaced by LEDS which can have inappropriate power. So how might this be controlled? One comment for surface water management stated this will only worsen existing problems and damage the environment which is what one felt has happened as the Barn Owl Close development.  | Welcome the overall agreement with the policies. LGS3- Quay Terrace Group to discuss whether to retain this as an LGS. It seems the landowner has stated there is already a covenant in place to prevent inappropriate development so could it seem with this in mind that it is taken out? Update LGS numbers.Consider the comments made for the other policies.  |

**Community facilities**

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| **Section of the online survey** | **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Community facilities section**  | Policy 12 to Policy 14 overall had agreement or strong agreement from the online respondents.  | Welcome the overall agreement with the policies.  |

**Transport and accessibility**

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| **Section of the online survey** | **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Transport and accessibility section**  | Policy 15 overall had agreement or strong agreement from the online respondents. Comments raised the issue of school parking and the hazard this creates for both the children and residents. It is encouraged that the village should be promoting walk to school initiatives to reduce driving. Also it is raised that whilst parking is a problem where could alternative space be provided to address this concern.  | Welcome the overall agreement with Policy 15. Note in the online survey Q8 was labelled as Policy 14 when in fact it was Policy 15- Parking Provision within Reedham. Acknowledge the comments raised for the concern of school parking and the need to promote better initiatives for encouraging walking to school where possible. Check the community action- can the PC work with the school and appropriate stakeholders to try and boost an incentive or encouragement for children to walk to school to create a behavioural change amongst children and parents? *This is already happening.* |

**Historic Environment**

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| **Section of the online survey** | **Stakeholder comments to the Regulation 14 consultation** | **NDP Response** |
| **Historic environment section**  | Policy 16 overall had agreement or strong agreement from the online respondents. One comment raised that for No 6. Gospel Hall - if this has now been sold with plans to convert to a house, is it too late to include in the Plan? | Welcome the overall agreement with Policy 16. Regarding the question raised by a respondent. It is not considered to late to include Gospel Hall in the NP since if plans are being put in place currently or in the future to convert the building then they must have regard to the policies intentions.  |