

Ref.	Date	Name	Organisation	Address	Postcode	Section	Support	Oppose	Supp w. mods	Comments	Reasons
RNP-01	19/10/2023	Louise Feavoyour	Marine Management Organisation	Pakefield Road, Lowestoft, Suffolk	NR33 0HT	Whole Plan				Yes	Please note this is a summary: Please consider the comments regarding the draft Neighbourhood Plan within our bespoke response attached given the inclusion of the River Yare in your plan area. We advise that you take note of any relevant policies within the East Marine Plan documents in regard to areas within the consultation plan that may impact upon the marine environment. Some examples of policies that may be relevant include: employment, social and biodiversity policies. These are provided only as a recommendation and we suggest you make your own determination of which are relevant. Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the Marine and Coastal Access Act, 2009. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.
RNP-02	23/10/2023	Shante Nash	Scottish & Southern Electricity Networks	5 Robert Brown House, Pipers Way, Thatcham	RG19 4AZ	Whole Plan				Yes	Asset Data would not be permitted to authorise works on behalf of SSEN. Please follow HSG 47 Guidelines when conducting all groundworks. If there are any concerns that the proposed works could affect existing network, please contact our Connections and Engineering Department on Tel: 0800048 3516 and they will be able to guide you further.
RNP-03	23/10/2023	Philip Porter	National Highways	Woodlands, Manton Lane, Bedford	MK41 7LW	Whole Plan				Yes	Thank you for consulting National Highways on the abovementioned Neighbourhood Plan. National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly. Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.
RNP-04	24/10/2023	Planning Technical Team	Sport England	Sport Park, 3 Oakwood Drive, Loughborough, Leicester	LE11 3QF	Whole Plan				Yes	Please note this is a summary: Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications
RNP-05	24/10/2023	Phillipa Nanson	Water Management Alliance	Pierpoint House, 28 Horsleys Fields, Kings Lynn, Norfolk	PE30 5DD	Whole Plan				Yes	Please note the following is a summary: 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. The principal function of the IDBs is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency. I note that two sites within the parish have been allocated for housing developments within the Greater Norwich Local Plan (GNLP1001 – 30 homes east of Station Road, and GNLP3003 – 30 homes on Mill Road). Whilst these have not been allocated within your own 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 Byelaws (3, 10 & 17) and Section 23 of the Land Drainage Act (1991) and Byelaw 4 (All explained in the full response) where developments are proposed within or partially within the Board's IDD.
RNP-06	24/10/2023	Phillipa Nanson	Water Management Alliance	Pierpoint House, 28 Horsleys Fields, Kings Lynn, Norfolk	PE30 5DD	Policy 11 & Community Action 2				Yes	I am pleased to note that Policy 11 includes promotion of the use of SuDS, and that Community Action 2 states that the Parish Council will work with landowners and statutory agencies to ensure maintenance of watercourses, specifically referring to the Lead Local Flood Authority (LLFA). I recommend that this action also includes reference to the Internal Drainage Boards specifically as regulators of riparian watercourses within their districts. As outlined above, 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.
RNP-07	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Paragraph 26, page 12				Yes	Para 26 says: 'These are the national and local plan policies within the Broads Authority and Broadland District Council'. This is factually incorrect as The Broads and Broadland Local Plans do not contain national policies. Also the sentence as it currently reads does not end by saying 'Local Plans'.
RNP-08	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Section 31, page 13 - 25				Yes	There is no need to repeat the policies in this section. It adds to the length of the document and policies need to have their supporting text.
RNP-09	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Paragraph 64, page 37				Yes	This paragraph references a consultation on the Broads Authority Design Guide. This consultation ended in December 2022 so it would be better to amend this to read 'the Broads Authority are preparing a design guide'
RNP-10	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Policy 7			Yes	It is not clear what is meant by 'local area' referred to in part b. It is not clear how e and f relevant to BNG? Perhaps they are separate clauses in this policy, but the policy starts off talking about BNG and the lettered criteria are meant to relate to BNG whereas e and f do not. The supporting text does not really talk about BNG in relation to policy 7. There is no mention of, for example, the most recent NE Metric to be used to calculate Net Gain.	
RNP-11	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Policy 8 & Paragraph 119				Yes	For information, the Broads Authority are looking at allocating the open space on Reedham Quay as amenity green space as shows in the map (in the full response) which includes an area that the group wish to allocate as Local Green Space.
RNP-12	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Policy 14				Yes	It is not clear what the 'certain types of commercial use or community use' that the policy related to.
RNP-13	10/11/2023	Natalie Beal	Broads Authority	Yare House, 62-64 Thorpe Road, Norwich	NR1 1RY	Appendix C, page 90				Yes	Within the checklist, a factual correction as point 14 & 15 are the same.
RNP-14	17/11/2023	Ross McGiven	Historic England	Brooklands, 24 Brooklands Avenue, Cambridge	CB2 8BU	Whole Plan				Yes	Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/
RNP-15	27/11/2023	Sally Wintle	Natural England	Hornbeam House, Crewe Business Park, Electra Way, Crewe, Cheshire	CW1 6GJ	Whole Plan				Yes	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

RNP-16	27/11/2023	Mark Hodgson	Savills	Unex House, 132-134 Hills Road, Cambridge	CB2 8PA	Policy 1		Yes			<p>The following is a summary: Savills have submitted this response on behalf of the landowner of 'Middle Field'. The Reedham Neighbourhood Plan Regulation 15 Submission Version seeks to provide protection against development on land commonly known as 'Middle Field', which is identified within Policy 1 as "an area of land between the two distinct parts of the village settlement" that "should remain open unless development proposals are for a community use". Policy 1 goes on to state that appropriate community uses could include a new village hall, school, or playing field. By way of background, the Reedham Neighbourhood Plan Regulation 14 Draft Version also sought to protect against development on this field, however, the Regulation 14 Draft Version identified the field as a 'Village Gap', rather than as a 'Middle Field'. In the Regulation 14 Draft Version, Policy 1 also identified the Village Gap as "an area of land between the two distinct parts of the village settlement", but instead of providing opportunities for community development, Policy 1 stated that "development that detracts from the open character of this area or reduces the openness and visual separation will not be permitted". The area identified as the 'Middle Field' in the Regulation 15 Submission Version is the same area as that identified as the 'Village Gap' in the Regulation 14 Draft Version. Our client sought some understanding of where the designation 'Village Gap' was derived from and we submitted representations based on clarity, lack of conformity with Local Plan, lack of formal consultation with our client and contradicting policies within the NP. Although Policy 1 has been updated since the Regulation 14 Draft Submission document to refer to the field as the 'Middle Field' rather than as a 'Village Gap' and provides a slight degree of flexibility in terms of the potential for community facility development, our client still feels as though their concerns have not been adequately addressed and that there is a lack of evidence to support the designation of 'Middle Field'. The representation highlights in detail where the Plan does not meet the basic conditions, why it is considered an inappropriate location for 'Middle Field' designation and why the Reedham settlement boundary is inappropriate given that Middle Field itself presents a sustainable opportunity for future development.</p>
RNP-17	28/11/2023	Andy Scales	NPS Property Consultants	5 Anson Road, Norwich	NR6 6ED	Whole Plan			Yes		<p>The following is a summary: NPS is commissioned by Norfolk Constabulary to prepare representations on infrastructure planning policy matters. Therefore, on behalf of the Constabulary, I would make the following comments, based on the role Norfolk Constabulary have for policing, making the county a safe place. The Neighbourhood Plan identifies that between 40 and 60 new dwellings are planned to be developed in the Neighbourhood Plan area. This will result in an increase in the population which will add some pressure to existing police resources in the area. To address this, further investment will be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional pressure will be placed on existing police resources. In terms of creating and maintaining safer communities, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Plan area.</p> <ul style="list-style-type: none"> • The Neighbourhood Plan should take the opportunity to include within its objectives (on page 10) to 'create and maintain a safer community and reduce crime and disorder'. This would be consistent with NPPF advice, and it is disappointing that this consideration is currently excluded. • The Neighbourhood Plan highlights within its provisions the importance of good design. It is therefore surprising that the Plan is silent on crime and disorder issues and fails to offer support for the well-established principles of crime prevention through good design and the 'Secured by Design' approach (as the design and layout of the built environment plays an important role in designing out crime, reducing the opportunities for and risk of anti-social behaviour along with allaying residents fear of crime and disorder). It is considered that Neighbourhood Plan policy should include a provision that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by an objective to 'create and maintain a safer community and reduce crime and disorder'. • The Neighbourhood Plan currently fails to recognise that police infrastructure will play an important role meet the needs of residents and maintain and enhance community safety. It is considered that this omission should be addressed in the Neighbourhood Plan and police services should be referenced in the Local Services, Infrastructure and Facilities section. <p>I trust that these matters can be incorporated into the Plan objectives, policies, and provisions to support / maintain a safe community and reduce the opportunities for crime and disorder (and help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.</p>
RNP-18	28/11/2023	Julie Cullis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Policy 7			Yes		<p>We are pleased to see that there is a strong focus from the local community on the protection of wildlife and important habitats. As a large proportion of the NP area has nationally and internationally important wildlife designations, Policy 7 will be important in both protecting and enhancing these sites. We generally support the wording in Policy 7 but recommend that the following is also included to provide a stronger basis for increasing biodiversity, protecting important habitats and wildlife and contributing further to the provision of green infrastructure: 'There are many ecological benefits to green roofs and green walls. One of the advantages is their contribution towards increased biodiversity. Therefore, we recommend including policy wording to incorporate these features, for example: i) 'Development should incorporate green roofs and green walls as appropriate, including on any new community buildings;' Buffer zones are designed to protect sensitive landscape patches and areas of high biodiversity. They provide important protection from the impacts of development. In light of this, we recommend adding the following wording, or similar: j) 'Buffer zones should be implemented around designated and sensitive wildlife sites, including County Wildlife Sites, as appropriate, to minimise development impacts on these sites.'</p> <p>'We agree with the following statement on page 44 of the NP: 'Wildlife movement along the Yare valley is to some extent compromised by the built development of Reedham, and any initiatives to enhance linkages to the north of the village, for example by tree and shrub planting in a strip of land alongside the railway line would be of benefit to wildlife.' To more easily fulfil this, we recommend that Policy 7 could include more specific wording, for example, 'Three trees should be planted to replace every tree that is lost, as appropriate, up to an optimum level. Any loss of hedgerow should be compensated for.....' (The current wording is: 'Any loss of trees or hedgerow should be compensated for by adequate replacement provision of greater value than the tree or hedgerow lost.')</p> <p>In line with Local Policy, linkages between habitats need to be promoted. In addition to generally aiding wildlife to move through the landscape and an increase in biodiversity, recent research indicates that green corridors can also help buffer wildlife from the effects of climate change. For these reasons, we note and welcome inclusion of green corridors in 'Policy 4: Design' but recommend that green corridors within the NP area should also be identified on a map and perhaps included as part of Policy 7 on Biodiversity. A map showing a visual representation of green corridors would ideally show all other existing green infrastructure including designated sites, County Wildlife Site, Priority Habitats, Local Green Spaces. This will make it clearer where opportunities exist for BNG delivery and where it can be most readily targeted.</p> <p>Minor amendments: As local provenance just refers to flora, (not fauna), we suggest that fauna is omitted from the following sentence 'Use predominantly native British species of flora and fauna of local provenance with due regard to climate resilience within the timescale of the current plan.' Please note that the link in the footnote '11' did not appear to work. (This was referred to in section f).</p>
RNP-19	28/11/2023	Julie Cullis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Community Action : Local Action to encourage wildlife			Yes		<p>We fully support this community action as it will provide benefits to wildlife and increase biodiversity. We recommend that community action could also include hedgerow planting 'where and as appropriate' and listed under actions investigated, as species-rich hedgerows particularly can support a wide range of wildlife species, including a number of Priority Species and serve as important ecological corridors for wildlife. We recommend a minor amendment to the following: 'The Parish Council will work with the local community to encourage action to enhance habitat and wildlife public areas.' (Add 'in' after the word 'wildlife?')</p>
RNP-20	28/11/2023	Julie Cullis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Policy 8	Yes				<p>We fully support the Local Green Spaces policy.</p>
RNP-21	28/11/2023	Julie Cullis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Policy 10			Yes		<p>We are pleased that there is strong support for maintaining the dark skies across Reedham, as one of the benefits of dark skies is for the protection of nocturnal wildlife. The NP area supports a number of bat and bird species and is home to an abundance of other species, some of which are Priority Species. We are very supportive of the Dark Skies policy but recommend some additional wording is added to the last paragraph of the policy, to ensure wildlife is protected as fully as possible with regards to artificial lighting. For example, 'Any lighting must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.' It is imperative for the protection of wildlife that each of these: wildlife roosts, foraging habitat and commuting routes are protected from artificial lighting. Specific reasons for this are given in the best practice guidance (https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/). For the benefit of any planning applications making reference to this policy, we recommend that reference to this best practice guidance is included in the plan.</p>
RNP-22	28/11/2023	Julie Cullis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Policy 11	Yes				<p>We support Policy 11. SUDS are important for biodiversity, increasing green infrastructure and reducing the transport of pollution to the watercourses.</p>

RNP-23	29/11/2023	Alasdair Hain-Cole	Environment Agency	Iceni House, Cobham Road, Ipswich, Suffolk,	IP3 9JD	Whole Plan				Yes	<p>The following is a summary:</p> <p>For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.</p> <p>We note the Broadland Local Plan was last reviewed and adopted in 2011. We have also identified important environmental constraints, within our matrix for currently screening neighbourhood plans, that affect this Neighbourhood Plan Area. We are, therefore, providing you with the following advice which identifies opportunities for you to strengthen the Plan and enhance the scope of environmental Objectives considered.</p> <p>The Draft Neighbourhood Plan includes areas which are located in Flood Zone 2 and 3. We welcome the inclusion of Policy 11: Flood and Surface Water Management. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.</p> <p>We have identified that the Plan area boundary includes Reedham Water Recycling Centre (WRC), which is currently operating close to or exceeding its permitted capacity. As the Plan does not allocate sites for growth development across the Plan period, we do not have any significant concerns. However, we would still expect to see consideration for any windfall developments captured in a relevant policy for Water Quality in the catchment of the Plan Area and serving WRC.</p> <p>Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.</p> <p>Your plan includes areas which are located on Principal Aquifers and in Source Protection Zone 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance.</p> <p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning.</p>
RNP-24	29/11/2023	Tessa Saunders	Anglian Water	Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire,	PE29 6XU	Policy 6 & Policy 11		Yes			<p>Thank you for consulting Anglian Water on the Reedham Neighbourhood Plan Reg 16 submission. Anglian Water has engaged with the Parish Council at the Reg 14 draft Neighbourhood Plan consultation, and we welcome the consideration of our comments and subsequent amendments to the neighbourhood plan to reflect our consultation response – as detailed in the supporting consultation statement.</p> <p>We therefore support the approach set out in the submission neighbourhood plan and welcome the positive approach taken to ensure the effective management of surface water run-off in Policy 6 Parking Provision and Policy 11 Flood and Surface Water Management.</p>
RNP-25	29/11/2023	Ian Catlow	Resident	-	-				Yes		<p>I object to your plan to classify our private garden as Local Green Space. As you can see this land is a private garden and is owned and maintained by the residents of Quay Terrace (Photo included with response).</p>
RNP-26	29/11/2023	Joe Wyatt	Norfolk County Council - Natural Environment	County Hall, Martineau Lane, Norwich	NR1 2DH	Policy 7				Yes	<p>Thank you for consulting us on the above Neighbourhood Plan.</p> <p>Following our previous response in relation to the Reg. 14 consultation, it is advised that paragraph 84 is further revised in relation to the introduction of mandatory BNG. The sentence "BNG will be a requirement from November 2023, although small sites have been delayed until April 2024." could be updated to state the following: "Mandatory BNG is expected to come into force from January 2024 for major developments and from April 2024 for minor developments, with secondary legislation and guidance due by November 2023".</p>
RNP-27	29/11/2023	Joe Wyatt	Norfolk County Council - Lead Local Flood Authority	County Hall, Martineau Lane, Norwich	NR1 2DH	Policy 11 & Community Action 2				Yes	<p>The following is a summary:</p> <p>The LLFA welcome that references are retained in the Draft Neighbourhood Plan and its proposed policies to various sources of surface water and fluvial flooding. It is also noted that reference has been included in the Regulation 16 versions in respect of groundwater flooding. Of the 16 policies proposed, Policy 11 (Surface Water Management) and its supporting text, along with Community Action 2 (Maintenance of Drainage Ditches) within the Flood and Surface Water Management Section of the Plan are of particular relevance to matters for consideration by the LLFA. The LLFA also welcomes objectives and Policy 4 on design around flooding constraints.</p> <p>Expansion of Policy 11 with reference to SuDS, reference to the parish location in Internal Drainage Board area and to the Greater Norwich Area Strategic Flood Risk Assessment Final Report Level 1 (2017) and Environment Agency mapping.</p> <p>With reference to Community Action 2, whilst supporting this need to point out that LLFA has power to enforce waterways within their jurisdiction are maintained, they do not have responsibility for that maintenance.</p> <p>According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding and 1 record of external/aneccdotal flooding in the Parish of Reedham. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.</p>
RNP-28	29/11/2023	Joe Wyatt	Norfolk County Council - Lead Local Flood Authority	County Hall, Martineau Lane, Norwich	NR1 2DH	Allocation of sites				Yes	<p>We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (however it is noted that no housing allocations form part of the plan). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.</p>
RNP-29	29/11/2023	Joe Wyatt	Norfolk County Council - Lead Local Flood Authority	County Hall, Martineau Lane, Norwich	NR1 2DH	Policy 8				Yes	<p>The document proposes 4 no. Local Green Spaces which are identified in Policy 8: Local Green Spaces and Figure 15 (these are the same as in the Policy 8/Figure 14 of the Regulation 14 Version). It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment on LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.</p>
RNP-30	29/11/2023	Joe Wyatt	Norfolk County Council - Minerals and Waste	County Hall, Martineau Lane, Norwich	NR1 2DH	Policy 1				Yes	<p>Norfolk County Council, as the Minerals and Waste Planning Authority, have no objections to the Reedham Neighbourhood Plan (Regulation 16 document). However, we have the following comments to make:</p> <p>Policy 1 states that the land should remain open unless development proposals are for a community use (such as a village hall or village school). Reedham Middle Field is over 5 hectares in size and is partially underlain by a safeguarded mineral resource (sand and gravel) in the north of the site. If a planning application was to be submitted for built development on this site then Policy CS16 'safeguarding mineral and waste sites and mineral resources' (or any successor policy) of the Norfolk Minerals and Waste Core Strategy would apply.</p>
RNP-31	29/11/2023	Joe Wyatt	Norfolk County Council - Minerals and Waste	County Hall, Martineau Lane, Norwich	NR1 2DH	Policy 8				Yes	<p>Local Green Space LGS 4 is over 3 hectares in size and is partially underlain by a safeguarded mineral resource (sand and gravel). Since the allocation is for local green space, it does not sterilise the mineral resource underlain. However, if a planning application was to be submitted for built development then Policy CS16 'safeguarding mineral and waste sites and mineral resources' (or any successor policy) of the Norfolk Minerals and Waste Core Strategy would apply.</p>
RNP-32	29/11/2023	David Brierley	Network Rail	1 Stratford Place, Mountfitchet Road, London	E20 1EN					Yes	<p>Thank you for consulting Network Rail regarding the above Reedham Neighbourhood Plan Reg 16 Consultation on the Reedham Neighbourhood Plan.</p> <p>After reviewing the associated information, I would like to inform you that Network Rail has no comments to the current proposals. However, please continue to consult Network Rail as the plans and proposals develop.</p>
RNP-33	29/11/2023	Elizabeth Chaplin	Resident	-	-	Policy 8		Yes			<p>I am a resident of quay terrace and have just found out that today is the last chance I have to object, to my garden being part of the villages green spaces. I don't believe it should be part of the plan as it will not achieve anything and may cause us problems. People may believe that if it is included in the villages green spaces, they have the right to use it. The village does need a green space near the river but an accessible one which they can use.</p>
RNP-34	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Policy 1			Yes		<p>The following is a summary:</p> <p>Despite changes to the policy following on from comments made at the Regulation 14 stage, the Council still has some concerns with policy wording, particularly as it is clear that the intention is to prevent further development on Middle Field beyond that allowed as community uses. There is overlap with the policy on local green space, but such as substantial restriction on development would be justified on robust and compelling evidence.</p> <p>The Council is also concerned that as written the policy may potentially conflict with current and emerging strategic policies that relate to development that is allowed, by exception, outside of development boundaries. The Council was not able to identify how conflicts with such policies had been assessed, or if such conflicts were considered justified, on what basis this conclusion was drawn. Overall, the Council remains concerned that the policy is not underpinned by adequate and proportionate evidence that justifies the policy as required by paragraph 31 of the NPPF. As such, on the basis of the information that the Council has been able to identify, it does not consider that the policy meets the requirements of the basic conditions and should be deleted or significantly revised, should the scope of previous consultation on policies now allow it to be so.</p> <p>Should it be considered by an inspector to be sufficiently similar to policies previously consulted upon, the Council has provided some suggested words for rewording the policy. Please see the full response for more detail.</p>

RNP-35	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 2, Policy 3 & Housing Needs Assessment		Yes	<p>The Council's comments at the Regulation 14 stage have been considered and the plan is now clear that the district affordable housing requirement is 33% and that policy 3 now specifies 60% affordable rent and 40% affordable home ownership. To note, there is a small grammatical error that needs updating whereby a bracket missing in paragraph 58 "(60% rented and 40% ownership going forward".</p> <p>The Council also commented on some factual errors within the Housing Needs Assessment both at a draft stage and the Regulation 14 stage. The comments related to statements in the executive summary, initially statement 6, but also on a number of subsequent occasions throughout the document, and therefore any calculations that use the percentage, e.g., statement 7 in the executive summary and throughout, which referred to 40% of new housing being 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 appears the figure may have been taken from the Affordable Housing Supplementary Planning Document, some elements of which are now in need of updating. 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. Whilst references to 40% have been removed/updated within the NP and the policies have been updated considering other comments, the factual errors remain in the HNA.</p> <p>The Qualifying Body's response, as noted in the Consultation Statement, was that '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.'</p> <p>Leaving the HNA as is, results in a lack of clarity and consistency between the two documents. As these are factual errors within the evidence document, these should be corrected. We are aware through our work with other Qualifying Bodies that errors of this nature have been corrected via a subsequent approach to AECOM and believe that this should also be the case here to ensure the clarity required by paragraph 16(d) of the NPPF is achieved. If, for whatever reason, it is not possible for AECOM to update the document then an Errata schedule should be appended to the start of the report to address any factual errors or inconsistencies.</p>
RNP-36	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 4		Yes	<p>The Council's comment at the Regulation 14 stage, that reference should be made to housing space standards, has been followed.</p> <p>At the Reg 14 stage the Council also made the following comment 'The Design Codes and Checklist which will be submitted alongside applications, as set out in Appendix C, will be used to help assess all planning applications ...' – There is a concern that the checklist should be proportionate to the scale of the proposal and that it is too detailed for the scale of development likely to come forward in the neighbourhood area. In addition, the requirement for all applicants to complete the checklist would seem to add a disproportionate requirement into the planning process that doesn't appear to be justified. We feel that 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.' The Council still feels that this is the case and reiterates the Reg 14 comment.</p> <p>The Council is also unclear as to what is meant by point i) in this policy; in particular, the last sentence: 'Close boarded fencing visible from publicly accessible locations and front gardens under 4m in depth will not be accepted.' It is unclear what the intention of this sentence is and how it is to be applied. The Council feels that for this policy to be in line with paragraph 16(d) of the NPPF (i.e., to be clearly written and unambiguous), this lack of clarity needs to be addressed.</p>
RNP-37	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 5		Yes	<p>The Council recommends that this policy should be deleted. Changes need to reflect that site GNL3003 on Mill Road for 30 homes is no longer to be included in the GNLP. The inspectors of the proposed Local Plan wrote in August 2023, stating: "We consider that there is insufficient evidence before us that a safe and suitable vehicular access can be achieved. The allocation should be deleted." See GNLP evidence document (11.1).</p>
RNP-38	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 6		Yes	<p>The Council's comment at the Regulation 14 stage looked to clarify the use of impermeable and permeable surfaces. The clarification has been made that parking and driveways should be constructed using permeable surfaces. The Council feels that this could be expanded to state that SuDS could be incorporated, cross referencing Policy 11 of the Reedham NP, which also references the introduction of permeable driveways or parking areas.</p> <p>The garage size of 7m x 3m stated in the policy is higher than the minimum standard set out in the Norfolk County Council Parking Guidelines document (https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/norfolk-parking-guidelines-2022.pdf), which states the following: "These standards assume a residential car parking space of minimum dimensions 5.0m x 2.5m (Figure 7). However, this needs to be widened to 3.0m, where the parking space is adjacent to any wall or fence. Additionally, the parking space would need to be lengthened to 6.0m where there is a wall, fence or garage at the end of the space.'</p> <p>The Council is unclear as to what evidence there is to justify setting a higher minimum standard in relation to Reedham, and to how these dimensions have been arrived at. The Council considers that this evidence should be reviewed in order to ensure that the policy is 'aspirational but deliverable' (para. 16 b) and 'based on proportionate evidence' (para 35 b).</p> <p>There is also a factual correction required at paragraph 73, which makes a reference to Policy 5. The Council believes this should be Policy 6.</p>
RNP-39	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 7		Yes	<p>The Council notes that comments at Regulation 14 have been considered. The NPPF was updated in September 2023 which means that reference to some of the paragraphs in the supporting text for this policy are now incorrect. For example, paragraph 83 on page 45 refers to paragraph 174 for mapping ecological assets and paragraph 96-101 for open spaces. The paragraph numbers have been affected by updates to the NPPF and therefore these references need to be updated.</p> <p>It is also noted that there has been a delay to the timetable for BNG to be mandatory from November 2023, with the current timetable proposing January 2024 for major sites and small sites from April 2024. Paragraph 84 needs to be updated to reflect these changes.</p> <p>The Council notes that these corrections should be made to be in keeping with the clarity and precision required by paragraph 16 of the NPPF.</p>
RNP-40	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 13		Yes	<p>Policy 13 is wider in scope than "community facilities" because it refers to "local businesses" and "home working". To make the policy easier to apply in decision-making, the Council considers that this issue merits attention. Changing the title of the policy to make it more accurately reflect the content would help to address this issue, as home working would not, in most cases, be related to a community facility.</p> <p>The Council notes there is some overlap with the second part of this policy and the ambitions of Policy 1. The first sentence of the second paragraph refers to "recreational provision", which could be inferred as provision of buildings for community use as well as public open space. However, the remainder of the policy is limited to recreational open space provision. Clarifying the policy's scope in this regard would be helpful in making it effective for decision-making. The policy also states that proposals will be 'permitted'. The Council feels that using the term 'encouraged' or 'supported' allows for a more positively worded policy.</p> <p>The Council considers that the above changes should be made to this policy in order to bring the clarity and precision required by paragraph 16 of the NPPF.</p>
RNP-41	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 14		Yes	<p>The Council's comments at the Regulation 14 stage queried whether the policy conflicted with paragraph 87 of the NPPF. Whilst the policy text has been reworded to prevent town centre uses being allowed in converted rural buildings, the Council still feels that clarification is required as to whether this policy purely applies to commercial/community uses. It is not clear what the Neighbourhood Plan's intentions are as regards a potential residential extension of a redundant rural farm building, either within the policy wording or within supporting text. The Council feels this should be clarified in order to meet paragraph 16(d) of the NPPF.</p>
RNP-42	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 15		Yes	<p>Since the Regulation 14 stage, the policy has been more clearly split in to two parts. However, both paragraphs appear to be seeking to address the same issues in referencing parking provision for Reedham Primary School. To improve this further it would be helpful to amend the first sentence so as not to reference the school. The Council also feels that the title should be updated to reflect that the policy is looking to address parking both within Reedham and specifically for the school.</p> <p>Again, the Council feels these clarifications would help to meet paragraph 16(d) of the NPPF.</p>
RNP-43	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 OWF	Policy 16		Yes	<p>The Council previously commented on this policy at the Regulation 14 stage with regards the application to NDHAs. We would reiterate our comments from the previous stage that the policy may need to more clearly distinguish between where development directly affects the NDHA (e.g., extensions where the character should be preserved), and where development is proposed within the setting of the NDHA, that needs to take into account the impact on the significance of the asset (see Para 203 of NPPF).</p> <p>If it is the intention of the policy to apply to NDHAs only, then the Council considers that there is no need to refer to all heritage assets being conserved (first sentence), as any designated assets will already be afforded the protection that any listing status warrants.</p> <p>The Council feels these clarifications would help to meet paragraph 16(d) of the NPPF.</p>

RNP-44	29/11/2023	Place Shaping Team	Broadland District Council	The Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Design Guide			Yes	<p>The Council previously commented on the Design Guide at the early draft and then subsequent Regulation 14 stages.</p> <p>As with the comments on the HNA noted above, the Qualifying Body's response to these comments was that there was no further scope to make changes to the guide, as it was produced by an external consultant, AECOM, and the final document had already been signed off and completed.</p> <p>Whilst the comments previously raised have not been addressed, the Council considers that it should raise a factual amendment that needs to be made within the guide, where it refers specifically to Policy 5: Design of the Mill Road Site (GNLP3003). This site has now been removed from the GNLP and the Council has recommended in that Policy 5 should be removed as a result (see earlier comment).</p> <p>As mentioned previously, through our work with other Qualifying Bodies, the Council is aware that errors of this nature have been corrected via a subsequent approach to AECOM. The Council believes that this should also be the case here to ensure that the clarity required by paragraph 16(d) of the NPPF is achieved, particularly as the Design Guide is a document that will sit alongside the Neighbourhood Plan as an important reference document.</p>
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The following was received as a late response

RNP-45	18/12/2023	David Brierley	Network Rail	1 Stratford Place, Mountfitchet Road, London	E20 1EN	Whole Document			Yes	<p>The following was received as a late response and may be considered at the discretion of the examiner as an addendum to RNP-32;</p> <p>As the Reedham plans develop, Network Rail must emphasize that any proposal that may materially change or increase the usage of a level crossing, or be adjacent to the railway must be consulted with us. We will resist any attempts to send more traffic over level crossings without appropriate mitigations, including closures/bridging which should be at the cost of the developers.</p>
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