

# Salhouse Neighbourhood Plan Publication - Response Summary

## General

ID	Name	Organisation	Agent
SNP14	Natalie Beal	Broads Authority	
<b>Comments:</b>	It is easier for Development Management Officers if the bullet points are numbered or lettered – i, ii, iii or a, b, c. It will be easier for Development Management Officers (who will be using these policies) if the reasoned justification was linked to the specific policy rather than being all together. I note page 49 on the consultation statement.		
SNP22	Mr Steven King	Historic England	
<b>Comments:</b>	Historic England is pleased to note the reference made to the historic environment, but would advise that a policy is added seeking to protect the fabric and the setting of designated and non-designated heritage assets. This policy could be subject to a caveat seeking to allow for new entries if further interesting historic buildings, structures or remains are found. This will assist in ensuring that both designated and non-designated heritage assets can be enjoyed by future generations of the area and make sure it is in line with national planning policy.		
SNP23	Mr Pat Abbott	Environment Agency	
<b>Comments:</b>	Thank you for your consultation received 9 January 2017 for the Salhouse Neighbourhood Plan. We are unable to provide bespoke comments on the neighbourhood plan; however we would like to draw your attention to the following general comments: Our principal aims are to protect and improve the environment, and to promote sustainable development, we: - Act to reduce climate change and its consequences - Protect and improve water, land and air - Work with people and communities to create better places - Work with businesses and other organisations to use resources wisely		
SNP24	Ms. Alison Collins	Natural England	
<b>Comments:</b>	As previously stated in our response to Salhouse Parish Clerk (letter dated 12 July 2016, our ref: 187109), we consider that Salhouse Neighbourhood Plan and its policies, due to the scale, nature and location of development being proposed, are generally unlikely to have any adverse effect on the natural environment, including designated sites and landscapes. We do not, therefore, wish to make specific comment on the details of this consultation. The lack of specific comment from Natural England should not be interpreted as a statement that the Plan will have no impacts on the natural environment. Other bodies and individuals may make comments that will help the District Council to fully take account of the environmental value of this area in their Plan making process.		

SNP25 Mr Stephen Faulkner

Norfolk County Council

**Comments:**

The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan (Reg 16 Consultation Version) and recognises the considerable amount of work and effort which has been put into developing the Plan to date. The County Council supports the Vision, Aims and Objectives set out in the Plan (page 13). In particular the County Council supports reference to ensuring key infrastructure such as schools and local facilities are retained. Support is also given to the aims and objectives relating to the environment; and economy. The County Council welcomes reference in the supporting text to local infrastructure being funded by the Community Infrastructure Levy (CIL) and/or S106/S278 agreements. This addresses the issue raised by the County Council in July 2016. However, the reference to S128 agreements should be replaced with S278 agreements (i.e. for accuracy). Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development.

SNP28 Ms. Hannah Wilson

Anglian Water Services Ltd

**Comments:**

Thank you for contacting Anglian Water regarding the above consultation, however, we have no comments to make.

### Salhouse 2016

ID	Name	Organisation	Agent
SNP1	Natalie Beal	Broads Authority	

**Comments:**

Consistent terminology – natural heritage versus natural environment versus natural environmental heritage? Are these referring to the same thing?

### Policies for the Environment

ID	Name	Organisation	Agent
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**Comments:**

The County Council as Lead Local Flood Authority would suggest the following policy be added to the Neighbourhood Plan: INTENTION The Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Salhouse area. It seeks to promote a range of assessment and mitigation measures that will ensure that any future development (or redevelopment) will have a neutral or positive impact on flooding. POLICY: FLOODING/DRAINAGE The Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site. Any new development or significant alteration to an existing building within the Salhouse area should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:

- Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.
- Have a neutral or positive impact on surface water drainage. Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as:
- Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).
- Where appropriate undertake sequential and /or exception tests.
- Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.
- Inclusion of appropriate allowances for climate change
- Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.
- Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.
- To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary.
- Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.

**Policy OE1**

ID	Name	Organisation	Agent
SNP2	Natalie Beal	Broads Authority	

**Comments:**

'significant damage' – what is classed as significant? 'impact' – any kind of impact? Do you mean negative? '..in terms of size...' – what do you intend by this? Expand the site into neighbouring land? Third bullet point – is the location of the replacement important too? '...on such sites...' – which sites are these? Do all or some of these criteria need to be met? Bullet point 2 – 'for example...' – would this be better in the reasoned justification for this policy? To whom will the mitigation measure be made available? We made the comment about natural heritage before. It is not clear what this means. Perhaps it is the natural environment or green infrastructure. Suggest either a clear definition as to what 'natural heritage' means or use a more recognised planning term. (I note page 48 of the Consultation Statement)

**Policy OE2**

ID	Name	Organisation	Agent
SNP3	Natalie Beal	Broads Authority	

**Comments:**

See comments on Policy OE1, re. 'natural heritage' term.

### Policy OE3

ID	Name	Organisation	Agent
SNP21	Mr James Watts		
	<b>Comments:</b>	Agree with the comment made by the Broads Authority regarding the importance of ensuring this policy also takes account of the need to include restrictions on other intrusive light sources e.g. poorly designed security lighting. Perhaps advice on this could be disseminated to households in the parish, noting Salhouse's special status? Important to ensure this becomes a clear element fed into future decision-making on development in view of the likelihood of further site development. May be worth considering if Salhouse should apply to become a certified Dark Sky Place with the International Dark Sky Association in view of its special areas of dark-sky access? See <a href="http://www.darksky.org">www.darksky.org</a>	
SNP4	Natalie Beal	Broads Authority	
	<b>Comments:</b>	What about other lighting like poorly designed security lighting? I note Page 50 of the consultation statement (where we have said this before and you have written 'noted').	

### Policy OE4

ID	Name	Organisation	Agent
SNP5	Natalie Beal	Broads Authority	
	<b>Comments:</b>	What are additional assets? Is the loss of agricultural land considered acceptable to the wider area?	

### Policy OE5

ID	Name	Organisation	Agent
SNP6	Natalie Beal	Broads Authority	
	<b>Comments:</b>	What/where are the village assets? Are these the areas listed as bullet points on page 16? Would a map be of use for interpreting the policy and identifying the 'assets'? Do you want to be stronger by saying 'expects' rather than encourages?	

### Policy OE6

ID	Name	Organisation	Agent
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SNP7      Natalie Beal      Broads Authority

**Comments:**      Is the aim of this to improve highway safety?

## Policy EMP1

ID      Name      Organisation      Agent

SNP9      Natalie Beal      Broads Authority

**Comments:**      What improvements are needed? Do you want to be stronger by saying 'expects' rather than encourages? Regarding viability. We say something like this in the reasoned justification for policies which mention viability: '...will only be permitted where the proposal is accompanied by a statement completed by an independent chartered surveyor which demonstrates that it is financially unviable or that any net loss of accommodation is necessary to allow appropriate relocation or redevelopment. Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises. The Authority will need to verify the content of such a report and may need to employ external expertise to do so (the applicant will need to meet the cost of this).' Should the alternative provision be of a similar like and kind?

## Policies for Housing

ID      Name      Organisation      Agent

SNP10      Natalie Beal      Broads Authority

**Comments:**      Page 19, column 3, para 3. 'they allow everyone...' we are not sure of the relevance of this sentence in this section. Does 'they' mean the policies? Which particular policy does this refer to? Page 20. Regarding sheltered housing, the Government seems to wish for more people to stay in their own homes for longer. One of the ways planning can address this is through lifetime homes and optional building regulations requirements. Some information on this is here, taken from the draft Broads Local Plan: With regards to adaptable dwellings, the Authority refers to the 16 criteria relating to Lifetime Homes . The Authority encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a way in which rooms can be used flexibly over time. The criteria in this policy also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods ambitions. The Authority also encourages the provision of some dwellings, in appropriate locations, to be designed to be accessible and accommodate wheelchairs. The details are set out in the Building Regulations part M3. The Census 2011 shows that the Broads Authority Executive Area has an ageing population and older people could benefit from more accessible dwellings. The NPPG is clear, however, in saying that 'Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied'. The Authority acknowledges that this standard may not be appropriate in some locations or for some schemes, but applicants are required to justify reasons for not including dwellings that are accessible and adaptable.

## Policies H1 and H2

ID      Name      Organisation      Agent

SNP11 Natalie Beal Broads Authority

**Comments:** We note that in H1 you wish for development to respect the character, height and density of the village. In H2 you say there should be a greater diversity of housing types. Do these contradict each other? When you say housing types, is this detached, terraced etc. or number of bedrooms or design?

SNP18 Spatial Planning Team Broadland District Council

**Comments:** During the Regulation 14 pre-submission consultation, Broadland District Council commented that there needs to be greater justification for setting a limit for new development at five properties. In addition, the existing character includes what is referred to as 'estates' (within the context and justification section) which clearly comprise more than five properties. The policy itself refers to the measure 'small scale' being based on 'circa 5 new houses per annum, this being the average rate of annual development.' However, it is explained in the supporting text that this excludes the larger schemes that have happened in the past, and that there have been new, larger developments approved in recent years. The Council remains of the view that this issue has not been adequately addressed in the Plan. Consequently, the policy seems to seek to arbitrarily restrict the scale of individual development even though larger scale developments have clearly been found acceptable in the past and are part of the character of the village. In addition, it is worth noting that the impact of many small sites can be greater than a smaller amount of large sites.

SNP20 Mr James Watts

**Comments:** The comments on p. 20 that development shall be "small scale, and respect the character, height and density of the village as a whole." is welcome. On p.19 it is noted that, including larger scale developments such as Barn Piece and the Salhouse Service Garage site, the average annual number of built properties over the past 40 years is seven. Limiting development to a figure close to this would logically seem the best way to ensure an organic growth, taking account of the need for some additional housing, which in its tempo and nature gives the village's rural character the best chance to be sustained in spite of the very considerable development pressures it will face from a number of factors: potentially several thousand houses in the new Rackheath development, the increased pressure on infrastructure, including connected roads, stemming from completion of the Norwich Northern Distributor Road, whilst reducing the temptation towards an ungainly and unattractive urban sprawl. In terms of the characteristics mentioned for future housing, ensuring it is in keeping with local equivalents by ensuring it replicates existing densities, heights and character is important to avoid jarring changes in housing structure which often occurs with more densely populated modern developments, In particular, where there are bungalows these should be faced with single-storey bungalows and not houses, with the same spacing between houses as earlier nearby equivalents and sufficient space between individual dwellings to avoid an inappropriately urban feel. It is also to be hoped that further development in those areas which have already seen development will be limited e.g. Norwich Road.

**Comments:**

The following is a summary. Please refer to the attachments for the complete representation. My client Grand Vision Developments objects to the emerging Salhouse Neighbourhood Plan. My client controls c.11.3ha of land off Norwich Rd, Salhouse (see attachments) that is being promoted for the development of a large public park and 96 dwellings. This proposal has been submitted for consideration as an allocation within the Greater Norwich Local Plan and it also forms a planning application which was submitted to Broadland District Council on 10th February 2017. My client is seeking the allocation of this site and mixed use development proposals within the Neighbourhood Plan. My client therefore objects to Policy H1, which omits this allocation, and which seeks to restrict new housing growth to that land within the existing settlement limits. This strategy fails to accord with paragraphs 54 and 55 of the National Planning Policy Framework. This restrictive approach is also not in compliance with the Joint Core Strategy. As an acknowledged sustainable, strategic development location it would be wholly unreasonable to impose a blanket restriction on new development outside the existing settlement boundary that is also the subject of ongoing review through the Greater Norwich Local Plan. It is also unreasonable to prevent new housing and green infrastructure development in an area immediately adjacent to the Growth Triangle.

**Policy H3**

ID	Name	Organisation	Agent
SNP12	Natalie Beal	Broads Authority	

**Comments:**

Does the second paragraph repeat the first? Where the policy refers to outside the settlement limit, how far out is allowed? How would development outside the development boundary be accessed?

SNP19	Spatial Planning Team	Broadland District Council	
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**Comments:**

There is some duplication of points within the policy, as currently worded. At the Regulation 14 stage, Broadland District Council suggested a slight amendment to the wording. This wording has been added to the policy as a new paragraph and causes some repetition. The Council suggests improving the clarity of the policy by deleting the second sentence of paragraph one and replacing it with the sentence currently comprising paragraph two (delete 'and' within this sentence and replace with a comma). The following wording should then be added to the end of this sentence, ', and where it respects the amenities of neighbouring uses.' The final paragraph can remain as it sets out a new condition.

**Projects to support the Neighbourhood Plan**

ID	Name	Organisation	Agent
SNP13	Natalie Beal	Broads Authority	

**Comments:**

There are community rights that can help protect important community assets. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/244635/130924\\_You\\_ve\\_got\\_the\\_power\\_accessible.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244635/130924_You_ve_got_the_power_accessible.pdf) Regarding mapping environmental features of the village. Some of this work could have been completed as part of the Norfolk-wide Ecosystems mapping project just recently started. The Neighbourhood Plan speaks a lot of linking to the two parts of the village together and also linking the Broad. Is this a project that is being worked on?

## Sustainability Appraisal

ID	Name	Organisation	Agent
SNP15	Natalie Beal	Broads Authority	

**Comments:**

Page 9, ENV9 row. Some policies refer to Carbon Footprint and housing policy refers to density and character so there could be some policies appropriate to this AS objective. Page 12, SOC8 row. Policies refer to development being of high quality. Page 14, ECON6. The employment policies would rate against this SA Objective.