



	<u>POLICY/PARA NO.</u>	<u>Reference No</u>	<u>Name of Respondent</u>	<u>Summary of Representation</u>	<u>PC Suggested Response</u>	<u>Action</u>
1	General	REG 14/002/FISHER-001	Kay Fisher	Impressed with the hard work that has gone into the document which demonstrates how much both villages value their surroundings.	Comments welcomed	No change to Plan
2	General	REG14/005/NCC/001	Norfolk County Council	The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.	Comments welcomed	No change to Plan
3	General	REG14/005/NCC/011	Norfolk County Council	The Historic Environment service would recommend the authors to include a direct reference to Historic England's published guidance on the preparation of Neighbourhood Plans.	Comments welcomed and suggested text to be included in the Preface	Amend Preface to refer to Historic England Guidance on Neighbourhood Plans
4	General	REG14/008/HE/013	Historic England	Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful in helping to identify what it is about your area which makes it	Reference to this guidance has been incorporated into the text of the JNP and the Character Appraisal. See REG14/005/NCC/011 above	See above

				<p>distinctive and how you might go about ensuring that the character of the area is retained. These can be found here:</p> <p><a href="http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p>		
5	General	REG14/008/HE/014	Historic England	<p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets:  <a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</a></p>	Comments noted. Reference to both will be made in the JNP as a new Appendix	New Appendix D "Other Useful Guidance" created.

				<p>HE Good Practice Advice in Planning 3 - the setting of heritage assets:  <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">&lt;https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/&gt;</a></p>		
6	General	REG14/006/B DC/001	Breckland Council	<p>Document Structure- welcome the further development of the document structure, particularly the replacement of bullet points in policies with either letters or numbers to aid referencing.</p>	Comments welcomed	No change to Plan
7	General	REG14/006/B DC/002	Breckland Council	<p>Use of images- as previously advised, the plan would still benefit from including photographs of buildings and other structures around the villages, as well as charts, tables etc, where relevant.</p> <p>Particularly to supplement the vision section of the plan,</p>	<p>The Character Appraisal includes a considerable number of original photographs and acts as evidence for the policies. It is considered this is the most appropriate</p>	<p>Appropriate photographs to illustrate policy enhancements have been inserted.</p>

				show examples of what is meant by high design standards; important open spaces and views. In particular, to support the design policies JNP1, JNP3, JNP4	document for them. However, where the policies are referring to a specific enhancement then appropriate photographs have been included	
8	General	REG14/008/HE/001	Historic England	Thank you for consulting Historic England about your Neighbourhood Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the Croxton, Brettenham and Kilverstone Joint Neighbourhood Plan 2017-2036 document (JNP).	Support welcomed	No change to Plan
9	General	REG14/008/HE/002	Historic England	In general, we welcome this very comprehensive, well ordered and informative JNP document, which	Support welcomed	No change to Plan

				<p>includes general reference to the history and character of the three parishes throughout, as well as paying attention to the area's character and historic environment. In particular, the preparation of the wide-ranging supporting Character Appraisal Statement that identifies individual character areas within the JNP area is welcomed as a useful evidence base for the policies within the plan, especially given the present absence of an up to date Conservation Area Appraisal and Management Plan for Croxton.</p>		
<b>10</b>	<b>General</b>	<b>REG14/009/C WPC/001</b>	<b>Coney Weston Parish Council</b>	<p>CWPC welcomes the aspiration of the Plan and endorses its content, particularly in relation to the hamlet of Rushford which co joins our parish. We support the policies relating to new design, the maintenance of open space both within and between settlements, the historic environment and to maintain local distinctiveness.</p>	Support welcomed	No change to Plan.

11	General	REG14/006/B DC/003	Breckland Council	<p>As previously advised, the plan still fails to fully recognise the significance of the SUE and its role and relation to the town of Thetford. Despite its physical position in the Parish of Croxton, Brettenham and Kilverstone, it is not necessarily appropriate to apply the same policies to the rural villages as to a large urban extension, which is highlighted in a number of the original comments. Furthermore, some of the policy restrictions are overly onerous, affecting viability and deliverability of development therefore not supporting sustainable development, as set out in the basic conditions</p>	<p>Following on from previous comments made prior to REG14, the Vision was recast to emphasize the rationale behind the plan i.e. integration between the rural area and the SUE (not the SUE and the town which is a role for the TAAP).</p> <p>Additional text was added at 3.3 to give context of the SUE as well as new text after 1.5.</p> <p>No specific evidence in relation to viability of new development has been supplied</p>	No change to Plan.
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					Some additional references to the background to the SUE and its relationship with the JNP have been added at 1.11 and 3.3 as a consequence of other representations	
<b>12</b>	<b>General</b>	<b>REG14/006/B DC/004</b>	<b>Breckland Council</b>	As previously advised, justification (evidence) for all the policies is limited and still needs developing.	No consultees have highlighted the need for any specific additional evidence. The reasoned justification for each policy and the policy wording are reviewed at each stage and appropriate changes made	Reasoned justification for each policy has been reviewed at each stage.



<b>13</b>	<b>Contents Page</b>	<b>REG14/006/B DC/005</b>	<b>Breckland Council</b>	Still not clear why the text needs to be this large?	The size of the font of the contents page is a matter for determination by the Parish Councils as authors, to review as they see fit. It has no impact on the soundness of the plan. However, if reducing font size aids reader then it can be reduced	Font size amended.
<b>14</b>	<b>General</b>	<b>REG14/007/N E/001</b>	<b>Natural England</b>	Natural England welcomes many of the policies within this plan, particularly those policies on protecting designated sites and local landscape character and enhancing ecological networks.	Comments welcomed	No change to Plan
<b>15</b>	<b>General</b>	<b>REG14/007/N E/002</b>	<b>Natural England</b>	We consider that the points on the environment would be better placed within an actual policy on the Environment	Agree that currently the environmental aspects are	New policy on Natural Environment

				rather than included in several policies as is currently the case. This policy could include all the information on the Breckland SPA and other relevant designated sites as well as policies on ecological connectivity and biodiversity gain.	dispersed throughout the plan and that given their level of importance in the Neighbourhood Plan area it would make sense to have one policy that clearly covers all aspects.	included as new JNP6
<b>16</b>	<b>General</b>	<b>REG14/007/NE/003</b>	<b>Natural England</b>	It would be useful to have a description of the designated sites and the ecology of the area in the background section	Agree, given the level of importance of protected sites in the Neighbourhood Plan area	Insert new wording on the designated sites and ecology of the area in new paras 2.3-2.6
<b>17</b>	<b>Para 2.25</b>	<b>REG14/005/NCC/005</b>	<b>Norfolk County Council</b>	Paragraph 2.25 (page 17) requires some clarity. The strategic urban extension (SUE) will provide an expansion of the existing secondary school and not a new secondary school as referred to in paragraph 2.25. Therefore, the wording used	Agree clarification is required. Amend Plan accordingly.	Amend wording of original Para 2.25 – now 2.28 to use the same wording as that in para 4.20

				in paragraph 4.20 (page 38) bullet point 4 should be used in paragraph 2.25.		
<b>18</b>	<b>Maps</b>	<b>REG14/005/B DC/007</b>	<b>Breckland Council</b>	As previously advised, the north compass rose is still missing from maps 2-5, as well as the scale. Also, it would be useful to locate the maps near to the text where they apply.	Mapping has been reviewed and comments taken on board.	Maps have been reviewed.
<b>19</b>	<b>Map 1</b>	<b>REG14/005/B DC/008</b>	<b>Breckland Council</b>	As previously advised, it would be useful if the key made it clear where the SUE was originally designated.	See comments above relating to maps	See above
<b>20</b>	<b>Maps2-5</b>	<b>REG14/005/B DC/009</b>	<b>Breckland Council</b>	The compass Rose and scale are missing from all these maps.	See comments above relating to maps	See above
<b>21</b>	<b>Maps2</b>	<b>REG14/005/B DC/010</b>	<b>Breckland Council</b>	It is not clear why the SUE is in purple on this map and mustard on all the others.	See comments above relating to Maps	See above
<b>22</b>	<b>Map 4 Croxton Settlement Boundary</b>	<b>REG14/005/B DC/011</b>	<b>Breckland Council</b>	As previously advised, it is not clear why there is a settlement boundary map for Croxton.	At the time of writing the REG 14 JNP, the adopted Development Plan for Croxton contained a	This issue will be reviewed at each stage of the JNP.

					<p>settlement boundary for the village. This is still the case although the Parish Council is aware that the most recent iteration of the Local Plan seeks to remove it. However, until the new Local Plan is adopted the settlement boundary is still in existence. The JNP will attempt to reflect the latest situation for the Settlement boundary at each stage</p>	
<b>23</b>	<b>General</b>	<b>REG14/008/HE/003</b>	<b>Historic England</b>	<p>We therefore welcome the identification of the Croxton Conservation Area and the listed buildings within it on the map provided in Section 1 of the plan, as well as the maps accompanying</p>	<p>Support welcomed. Agreed it useful to have a map showing the specific designations and</p>	<p>Amend character area maps to show all heritage assets – designated and non-designated</p>

				<p>each of the character areas identified by the Character Appraisal, which also indicate the other heritage assets present in each area. The only suggestion we would make would be, if possible, to modify the maps slightly to indicate what grade of designation the listed buildings were (Grade I/II* or II) as part of the colour coding.</p>	<p>grades. This could be incorporated into the Character Area Maps</p>	
24	<p><b>Page 12, Croxton Settlement Boundary</b></p>	<p><b>REG14/006/B DC/012</b></p>	<p><b>Breckland Council</b></p>	<p>As previously advised, this states it is <i>'not proposed ... to identify, remove, amend or alter the settlement boundary'</i>. This not consistent with including a map of the settlement boundary of Croxton and this inclusion will alter the boundary as the emerging Local Plan proposes to remove it.</p>	<p>See above in respect of comments relating to the emerging Local Plan.</p> <p>BDC rep REG14/005/BDC/011</p> <p>The map is included at the beginning of the plan and gives</p>	<p>No change to Plan but keep issue under review for subsequent versions.</p>

					<p>some context to the past status that Croxton has had in the planning hierarchy. It is purely for context and in no way purports to promote or allocate a Settlement Boundary for Croxton – in the same way that the inclusion of environmental information does not infer that the JNP is allocating an SPA. Once the emerging Local Plan is adopted then the subsequent version of the JNP will respond accordingly.</p>	
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25	Page 15 para 2.14	REG14/010/TT C/001	Thetford Town Council	Arlington Way is separated by the River Thet not the Little Ouse	Arlington Way has the River Ouse to the South and the Thet to the north	Paragraph 2.18 (formerly 2.14) has been amended to clarify
26	Page 15 Para 2.15	REG14/006/B DC/013	Breckland Council	The explanation of what "The Brecks" are which is now in policy JNP3 would be better placed here rather than in the policy.	Agree some explanation is required however it may be best placed at 2.2. as it will relate to all 3 parishes.	Insert new explanatory text about the Brecks at 2.2.
27	Page 16 para 2.18	REG14/010/TT C/002	Thetford Town Council	The parish map clearly shows that Tesco Supermarket and Thetford Garden Centre are both in Thetford and so do not form part of the JNP	Agree to amend	Wording of 2.28 amended accordingly.
28	2.27 Page 17	REG 14 /001/CLAYDO N - 002	Leah Claydon	Refers to "little identifiable industry"  There are several commercial businesses run from homes in Croxton including a jeweller's, medical device business and Dave's emporium to name but a few.	Original Paragraph 2.28 (now 2.32) refers to Dave's emporium and one other business. It is difficult to fully quantify all business activity in a village especially	Amend wording of Para 2.32

					<p>if much of it is low key and carried out at home.</p> <p>However, Para 2.28 could be extended to refer the fact that there are other businesses being run from homes.</p>	
29	2.21	REG14/ 001/CLAYDON - 001	Leah Claydon	<p>Refers to line" no longer available"</p> <p>Implies won't be available in the future when the village has not yet decided on the future of the PO/Shop and there is a real chance of the shop/PO closing</p>	<p>The Parish Council understands that the previous occupier has retired and vacated the premises. The premises require extensive refurbishment before they would be suitable for any other use for which funding has not been identified. Some</p>	No change to Plan.



					<p>interest has been expressed in</p> <p>running the PO but little progress has been made. It is therefore likely to be some time before the appropriate Authority determines whether the PO is likely to be re-established.</p> <p>Therefore, the current wording in the plan is still appropriate and will be reviewed before the Plan is submitted to reflect the current position at the time of writing.</p>	
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<b>30</b>	<b>Page 17 para 2.29</b>	<b>REG14/010/TT C/003</b>	<b>Thetford Town Council</b>	The HQ of STANTA is West Tofts Camp not Bodney Camp	Comments noted. Agree to correct the error	New wording in Paragraph 2.32 to refer to West Tofts
<b>31</b>	<b>Page 18 para 2.33</b>	<b>REG14/010/TT C/004</b>	<b>Thetford Town Council</b>	Tesco's Supermarket and Thetford Garden Centre are not in the village but are located in the town of Thetford	See response to REG14/010/TTC/00 2 above	See above
<b>32</b>	<b>Page 19 para 2.40</b>	<b>REG14/010/TT C/005</b>	<b>Thetford Town Council</b>	As plan references the railway station they should be pressing for additional parking to cope with the increase in use from the residents of the Sustainable Urban Extension (SUE) as stated in the retained TH7 document	Whilst it is appreciated this is a concern for many parties. The potential solutions lie outside of the JNP area and therefore it is not appropriate for the JNP to contain a policy that relates to land outside of the JNP area as the JNP cannot require them to come	No change to Plan

					forward. However, through the Greater Thetford Development Partnership (GTDP) the Parish Councils can seek to press for a solution.	
<b>33</b>	<b>Page 20,</b>	<b>REG14/006/B DC/006</b>	<b>Breckland Council</b>	<p>Whilst it is welcomed that the SUE is now referred to in para 1.6 -1.10,it could be beneficial to add more detailed context for Thetford SUE,maybe as an individual section drawing on the work which has already been established-TAAP and planning application, due to the significance of the SUE in forming the key housing growth for Thetford and the parishes.</p>	<p>Additional context for the SUE has already been included in paras 1.6-1.10. It is unclear precisely what is being asked for here and what value it would add to the JNP policies without repeating what has already been said in other documents. E.g. the TAAP.</p> <p>Some additional wording in respect</p>	Amended wording at 1.11.

					of the relationship between the TAAP and the SUE policies is to be added at 1.11	
<b>34</b>	<b>Section 3 – A Vision for the Parishes</b>	<b>REG14/005/N CC/002</b>	<b>Norfolk County Council</b>	The County Council supports the Vision, Aims and Objectives set out in the Plan (pages 21 to 23). In particular the County Council supports reference to ensuring key infrastructure such as schools and health facilities are retained or improved. Support is also given to the aims and objectives relating to the environment; and economy.	Comments welcomed	No change to Plan
<b>35</b>	<b>Page 22 Vision</b>	<b>REG14/006/B DC/014</b>	<b>Breckland Council</b>	Redraft the vision in the light of further consideration of the connection between the urban extension, Thetford and the rest of the parish.	Agree that more emphasis could be given in the text and the vision to creating a transition between urban and rural character.	New wording added in respect of transition at para 3.3 and in the Vision

36	Page 22 Objectives Housing 2 <sup>nd</sup> point	REG14/006/B DC/015	Breckland Council	Plan should define in text what the local vernacular is.	Agree that some definition of local vernacular (which is defined in the CA) could be included in the reasoned justification for Policy JNP1 rather than in the objectives.	Include additional text on defining vernacular in reasoned justification for JNP1
37	Page 22 Objectives  Environment 1 <sup>st</sup> and 2 <sup>nd</sup> point	REG14/008/HE /004	Historic England	<p>We welcome the inclusion, in Section 3: A Vision for the Parishes, of specific mention of preserving and enhancing the heritage of the JNP area, including built heritage and the setting of locally important heritage assets. We would suggest, however, the following slight amendment to the wording of the following sentences under the 'Environment' section, in order to ensure the JNP uses current terminology:</p> <p><i>"To conserve and enhance existing open spaces, important views, <b>the built and historic environment</b> and</i></p>	Agree suggested wording.	Amend 1st and 2 <sup>nd</sup> bullet points as suggested by Historic England.

				<p><i>wildlife areas throughout the neighbourhood plan area”</i></p> <p><i>“To conserve and where possible enhance local distinctiveness in the historic and natural environments...”</i></p>		
38	Page 22 Objectives Environment 4 <sup>th</sup> and 5 <sup>th</sup> point	REG14/006/B DC/016	Breckland Council	Change word “protect to preserve”.	<p>The choice of individual wording is a matter for the authors of the plan in this case the Parish Councils. Neither word would render the Plan unjustifiable. Dictionary definitions:</p> <p>Protect – keep safe from harm and injury</p> <p>Preserve – maintain in its</p>	No change to Plan. Wording amended because of other representations

					<p>original or existing state</p> <p>in this context, the use of the word preserve would seem to imply less change was permissible.</p> <p>Historic England have suggested some alternative wording and the Plan will be amended to reflect the Historic England request.</p> <p>See REG14/008/HE/004 above.</p>	
39	<p><b>Page 22 Objectives</b></p> <p><b>Environment 3<sup>rd</sup> point</b></p>	REG14/006/B DC/017	Breckland Council	Text required to define why the “break” between Croxton village and the A11 is important.	<p>Agree that more detail on the “Strategic Gaps” is required. Add additional text in the reasoned justification of the</p>	<p>Additional text in reasoned justification for Policy JNP11</p>

					"Strategic Gaps" policy. Policy is to be renamed.	
40	Page 22 Objectives  Environment 4th point	REG14/006/B DC/018	Breckland Council	Suggest inclusion of the words "preserve and enhance"	See comments above in respect of the word "preserve". Agree insertion of "enhance"	Insert "and enhance" in bullet point 4.
41	Page 22	REG14/010/TT C/006	Thetford Town Council	This plan should aim to improve cycle links to the town of Thetford as this is the centre that provides a lot of their services.  Enhance green route in Thetford by improving the pathway along the River Thet	Brettenham and Kilverstone PC has already installed a cycle and wheel chair friendly path in conjunction with TTC from Arlington Way to Nuns Bridges  An additional objective in respect of cycling and linking up with the Thetford loops has been included	Additional objective added to page 25.



42	Infrastructure	REG 14/002/FISHE R-002	Kay Fisher	<p>All businesses need a viable and fact internet connection. It is also a fact that much entertainment and fact finding and even shopping is only available via an internet connection now. Thus, similar to transport networks (roads) provided and maintained by a precept – could this be applied to internet provision.</p>	<p>Norfolk County Council have a project “Better Broad Band for Norfolk”</p> <p><a href="http://www.betterbroadbandnorfolk.co.uk/faqs/">http://www.betterbroadbandnorfolk.co.uk/faqs/</a></p> <p>which aims to make available superfast broadband (24 Megabits per second and above) available to as much of Norfolk as possible with the funding available and enabling basic broadband (2Mbps+) as a minimum, right across Norfolk, so that everyone who wants access to broadband can have it. Rushford</p>	<p>Insert new paragraph after 4.21 to refer to the importance of high speed broadband as an infrastructure consideration</p>
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					for example is having cables laid currently and Croxton was one of the first villages to receive the service.	
43	Infrastructure	REG 14/ 004/CLH PIPELINE - 001	CLH Pipeline System Ltd	Plan of pipeline apparatus supplied.	Plan noted	No change to Plan
44	Page 26 JNP1 Design and Materials	REG14/006/B DC/019	Breckland Council	Reconsider creating separate design policy for the SUE from the rest of the Parish.	As previously advised do not agree. This undermines the purpose and rationale for the JNP. The rationale behind the plan i.e. integration between the rural area and the SUE	No change to Plan

					<p>(not the SUE and the town which is a role for the TAAP).</p> <p>The TAAP already sets design principles for the SUE (TH20) and the outline planning application supporting information sets the design context. The emerging Breckland Local Plan proposes to roll Policy TH20 forward thereby underlining its relevance. It is difficult to see what more a separate design policy for the SUE would expand upon that isn't already covered within this policy</p>	
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					or the Masterplan for the site.	
45	JNP1	REG14/008/HE/005	Historic England	We also welcome policy JNP1, dealing with the design of new housing and the use of materials. The use of the Character Appraisal Statement as an evidence base to underpin this policy and others is, as noted above, considered a useful and comprehensive approach.	Support for policy welcomed.	No change to Plan
46	JNP1 Housing Design & Materials4 9	REG14/010/TT C/009	Thetford Town Council	Notwithstanding that they may be a desire to develop a policy that pertains to the historic village cores (HVC) the retained document TH20 Vison for the Thetford Urban Extension deals with this.  This NP as a lower tier document should not conflict with TH20	The rationale for the JNP is about integration not just of built development but of communities (people).  This policy relates both to the SUE and to the area outside of it. It is not in conflict with Policy TH20	No change to Plan

					and is aimed at adding value to it. See also BDC reps requiring specific design policy for the SUE.  See REG14/006/BDC/019 above.	
47	Page 26 JNP1  Design and Materials	REG14/006/B DC/020	Breckland Council	Policy is too long for day to day use by officers. Combine para 1 2 and 4 in the same paragraph.	Policy wording has been reviewed, as a consequence of this, and other representations and is now shorter	Policy has been reworded.
48	JNP1 1 <sup>st</sup> para 2 <sup>nd</sup> sentence	REG14/006/B DC/021	Breckland Council	What is "cultural history"? Replace with heritage.	Policy wording has been reviewed, as a consequence of this, and other representations	Policy has been reworded.
49	JNP1 2 <sup>nd</sup> para	REG14/006/B DC/02	Breckland Council	Reasoned justification should provide more detail on local vernacular	Agreed. See response to REG14/006/BDC/015 above	New text has been added in the reasoned justification paras 4.7-4.10

50	JNP1 2 <sup>nd</sup> para	REG14/006/B DC/023	Breckland Council	Provide the evidence outlined or replace “in the parish” with “of the relevant settlement”	Agree.	Use suggested wording.
51	JNP1 3 <sup>rd</sup> para	REG14/006/B DC/024	Breckland Council	Define the type of protected sites being referred to.	Policy has been reworded, as a consequence of other representations and a separate policy relating to the ecology and natural environment will be added.	Policy reworded, as a consequence of other representations
52	JNP1 criterion b	REG14/006/B DC/025	Breckland Council	Overly onerous requiring residents being able to access rear gardens by other means than through the house. Remove criterion b)	Do not agree this is overly onerous. It is about good design solutions which should be promoted. It has been used successfully in other Neighbourhood Plans. . e.g. Yaxham	No change to Plan
53	JNP1 criterion c	REG14/006/B DC/026	Breckland Council	Unless specific evidence is available suggest the criterion be reworded:	Agree to reword as suggested.	Reword criterion c as follows: “Each new residential

				<p>“Each new residential plot should also have regard to the need to provide for any necessary vehicular parking, ancillary storage and refuse and recycling”</p> <p>Highways Authority already have standards for garages.</p>		<p>plot should also have regard to the need to provide for any necessary vehicular parking, ancillary storage and refuse and recycling”</p>
54	JNP1 criterion e	REG14/006/B DC/027	Breckland Council	<p>This approach risks the retention of low value trees and hedgerows.</p> <p>Suggest rewording:</p> <p>“where possible existing natural features such as trees of high and moderate quality with identifiable aboricultural, landscape or cultural values as well as important ...”</p>	<p>The suggested wording is at odds with previous comments from BDC about onerous requirements and lack of clarity. What is a tree of moderate quality and how is it defined? What also is the harm of retaining trees and hedgerows that may not be of high quality?</p> <p>This criterion is to</p>	<p>Criterion e deleted from JNP and moved to new and Natural Environment Policy</p>

					be removed and incorporated in a separate ecology and Natural Environment Policy	
55	Para 4.3 (JNP1)	REG14/005/N CC/006	Norfolk County Council	<p>This Neighbourhood Plan despite reference to a drainage issue in The Street, Croxton (page 27, paragraph 4.3), does not discuss flood risk, or set a policy for surface water drainage for new developments. Therefore, the County Council considers that a flooding policy should be included in the Plan, the following policy is advised;</p> <p>“INTENTION</p> <p>The Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Plan area. It seeks to promote a range of assessment and mitigation</p>	<p>Agree that this is an important issue that often appears to be considered at too late a stage.</p> <p>The proposed wording is very similar to that of Proposed Policy ENV09 of the Emerging Breckland Local Plan which is likely to be adopted in advance of this JNP.</p>	Include new policy on surface water drainage and flooding as new Policy JNP10



				<p>measures that will ensure that any future development (or redevelopment) will have a neutral or positive impact on flooding.</p> <p>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.</p> <p>Any new development or significant alteration to an existing building within the Plan 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</p>	<p>Policies in the JNP should seek to add to existing development plan policies rather than repeat them however it is an important issue that can generate strong feeling locally and therefore</p> <p>Happy to include the new policy to satisfy any NCC concerns.</p>	
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				<p>planning authority will be required to demonstrate that it would:</p> <ul style="list-style-type: none"><li>• Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.</li><li>• Have a neutral or positive impact on surface water drainage.</li></ul> <p>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:</p> <ul style="list-style-type: none"><li>• Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).</li><li>• Where appropriate undertake sequential and /or exception tests.</li></ul>		
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				<ul style="list-style-type: none"><li>• Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.</li><li>• Inclusion of appropriate allowances for climate change</li><li>• Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.</li><li>• 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.</li><li>• 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.</li><li>• Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of</li></ul>		
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				ordinary watercourses or culverts, and their associated funding mechanisms.		
56	JNP1	REG14/011/Dawson/001	Mr David Dawson	Any new houses should have enough parking for multiple cars, seeing that most couples/families will have 2 or more cars, depending on whether their offspring drive as well.	Comments noted. An aspiration of the JNP is to ensure that realistic provision is made to prevent the appearance of new development being marred by ad hoc parking	No change to Plan
57	P28 JNP2 Housing Density 1 <sup>st</sup> para	REG14/006/BDC/028	Breckland Council	The policy or supporting text should list the density information referred to in the policy, or make specific reference to the part of the Character Appraisal that deals with the issue of density.	Agree that the policy wording needs reviewing. Noted this response is the complete opposite of the TTC representation.	Policy wording has been amended as a consequence of other representations
58	JNP2 Housing Density	REG14/010/TT C/010	Thetford Town Council	This plan should confine itself to the HVC's as overall housing density for the SUE is covered by the outline planning permission and the associated masterplan.	This is the complete opposite to the BDC representation	See above

					which is seeking more detail.  See REG14/006/BDC/028 above	
59	<b>P28 JNP2 Housing Density 3rd para</b>	<b>REG14/006/B DC/029</b>	<b>Breckland Council</b>	Ecology doesn't fit in this policy. Consider a new policy for ecology	See response to Natural England Comment REG14/007/NE/002 above	See above
60	<b>P29 JNP3 Enhancing Village gateways</b>	<b>REG14/006/B DC/030</b>	<b>Breckland Council</b>	Move clarification of the "Brecks area" to the text at 2.15.	See response to REG14/006/BDC/013.  It is helpful to have examples of Brecks habitat in the policy.	See above
61	<b>P29 JNP3 3<sup>rd</sup> para</b>	<b>REG14/006/B DC/031</b>	<b>Breckland Council</b>	Consider identifying key gateway sites on a map	Agree these could usefully be shown on the map	New map to show key gateways

62	P29 JNP3 4th para	REG14/006/B DC/032	Breckland Council	Delete paragraph and refer to emerging District Local Plan in the supporting text.	<p>This comment is contrary to other previous comments made by BDC about a need for an ecology policy.</p> <p>This text will be removed from this policy and included within a separate policy for Natural Environment to be included as new JNP6</p>	See response to REG14/007/NE/002 above
63	P29 JNP3 4th para	REG14/006/B DC/033	Breckland Council	Delete “within vicinity”	<p>Policy wording is to be revised</p> <p>See response to Natural England REG14/007/NE/002.</p>	See above. Policy wording has been revised

64	JNP3	REG14/010/TT C/011	Thetford Town Council	No additional comments to those presented by Breckland Council	Noted. See response to BDC reps on JNP3	See BDC rep
65	P29 JNP3 para 5 and 6 ecology	REG14/006/B DC/034	Breckland Council	Ecology doesn't really fit in the policy. Suggest creation of separate ecology policy	See response to Natural England REG14/007/NE/002.	See above
66	P29 JNP 3 6 <sup>th</sup> para	REG14/006/B DC/035	Breckland Council	Refers to unspecific government guidance on planning and biodiversity. If it is not possible to refer to specific guidance it is preferable to remove that part of the sentence	See response to Natural England REG14/007/NE/002.  And the creation of a separate Natural Environment Policy	See above
67	P31 JNP4 Integrating Developme nt	REG14/006/B DC/036	Breckland Council	Welcome the requirement for affordable housing to be well integrated with market housing	Comments welcomed	No change to Plan
68	P31 JNP4 Integrating Developme nt	REG14/006/B DC/037	Breckland Council	Consider revising the policy to create a design policy for the SUE which reflects the role of the SUE as an urban extension to Thetford in addition to the relationship with the rest of the parish and	See response to REG14/006/BDC/019 above	See above

				incorporates mixed communities, inclusive design and community consultation		
69	P31 JNP4 Integrating Development	REG14/006/B DC/038	Breckland Council	Have one policy for the SUE – move relevant policy from JNP1 and JNP2 into this one	Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.	Policy wording has been amended as a consequence of other representations
70	P31 JNP4 Integrating Development	REG14/006/B DC/039	Breckland Council	It is unclear whether the issue of Designing out Crime has been considered.	Agree this needs clarification. Policy wording and supporting text has been amended to refer to this issue.	Policy wording amended to refer to Designing out Crime
71	P31 JNP4 Integrating Development 1 <sup>st</sup> para	REG14/006/B DC/040	Breckland Council	Amend end of sentence to read “and materials of <del>the parish as identified in the relevant Character Appraisal</del> Thetford”	This appears to go against the rationale of the JNP which is to integrate the SUE with the rural area – both built development and communities.	Policy wording has been amended as a consequence of other representations



					Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.	
72	<b>P31 JNP4 Integrating Development  2nd para</b>	<b>REG14/006/B DC/041</b>	<b>Breckland Council</b>	Amend to “and where possible appropriate development of urban character should occur closer to the town discouraged”	<p>This appears to go against the rationale of the JNP which is to integrate the SUE with the rural area – both built development and communities.</p> <p>Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.</p>	Policy wording has been amended as a consequence of other representations

<b>73</b>	<b>P31 JNP4 Integrating Developme nt  5<sup>th</sup> para</b>	<b>REG14/006/B DC/042</b>	<b>Breckland Council</b>	Remove from policy and add to supporting text	Agreed.	Move text from policy to reasoned justification.
<b>74</b>	<b>JNP4 Integrating the SUE</b>	<b>REG14/010/TT C/012</b>	<b>Thetford Town Council</b>	<p>Concur with BDC comments</p> <p>Notwithstanding the HVC within the NP needs to address the design principles for arriving at the larger settlement of Thetford, a vision that embraces the visually larger houses</p> <p>Visually larger houses can be internally sub-divided to provide multiple individual dwellings consistent with other town dwellings on the original A11 corridor. All bin storage and parking should be located at the rear of the buildings and not on the primary frontage.</p>	Policy has been recast to emphasize the need for a gradual transition between urban Thetford and the rural parishes.	Policy wording has been amended as a consequence of other representations
<b>75</b>	<b>Historic Environme nt and Character</b>	<b>REG14/005/N CC/008</b>	<b>Norfolk County Council</b>	The Historic Environment service commends the coverage on historic environment and heritage in the parishes; especially the heritage	Comments welcomed	No change to Plan

	(JNP5)			reference under the environment objective (page 22), policy JNP 5 (page 33) and policy JNP10 (page 43).		
76	JNP5 – Historic Environment	REG14/008/H E/006	Historic England	We particularly welcome Policy JNP5: Historic Environment and Character, and are pleased that it emphasises the need to preserve and enhance or protect the heritage assets in the JNP area. We suggest that the policy could be strengthened further with the following modification to the last sentence of the second paragraph <i>“The heritage statement should also clearly identify where harm to heritage significance has been avoided or minimised where possible through mitigation, and that unavoidable harm to significance is clearly and convincingly justified by the public benefits delivered by the proposed scheme”</i> . We also suggest that ‘non-designated’ is used instead of ‘undesigned’, in line with the	Support Welcomed. Agree to the suggested wording and to replace undesigned with non-designated in accordance with the NPPF	Amend wording of JNP5 as set out in the HE representation.

				terminology used in the National Planning Policy Framework (NPPF)		
<b>77</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/043</b>	<b>Breckland Council</b>	Replace “undesigned” with “non-designated”	See HE representation above.	Replace “undesigned” with “non-designated”
<b>78</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/044</b>	<b>Breckland Council</b>	Add important landscape features, or important views/village gateways.	This subject is covered by Policy JNP 3 and also new Policy JNP6	No change to Plan.
<b>79</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/045</b>	<b>Breckland Council</b>	Requiring a statement goes beyond what is statutorily required.	It is beyond statutory requirements but is not unduly onerous and can easily be covered by a design and access statement which is a statutory requirement. (See also response to Historic England rep	No change to Plan

					REG14/008/HE/006 above)	
<b>80</b>	<b>JNP5 Historic Environment</b>	<b>REG14/010/TT C/013</b>	<b>Thetford Town Council</b>	Within the SUE TH21 and TH23 already address these issues, so unless a more detailed vision (which we would welcome) this lower tiered document should not conflict with this.	Do not agree. The policy is applicable to all 3 parishes and also outside of the SUE and does provide appropriate guidance and is supported by other respondents	No change to Plan
<b>81</b>	<b>P33 JNP5 Historic Environment</b>	<b>REG14/006/B DC/046</b>	<b>Breckland Council</b>	Include the list of designated and undesignated heritage assets in the Plan not the Character Appraisal	All heritage assets are listed as new Appendix B	Include new Appendix B identifying all Heritage Assets – designated and non-designated
<b>82</b>	<b>JNP 5 Historic Environment</b>	<b>REG14/008/H E/007</b>	<b>Historic England</b>	The government's National Planning Practice Guidance is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's	Support welcomed	No change to Plan

				<p>local plan into action but at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest or locally listed buildings. We are pleased to note, therefore, the inclusion of locally identified elements of the historic environment in the JNP, which the plan then aims to protect.</p>		
83	Para 4.16	REG14/006/B DC/047	Breckland Council	Replace “undesigned” with “non-designated”	See response to HE representation above.  REG14/008/HE/006.	Replace “undesigned” with “non-designated”
84	Transport and Highways Safety (JNP 6)	REG 14/002/FISHE R-003	Kay Fisher	As Kilverstone is almost a suburb of Thetford, rural paths/pavements (similar to the path linking Arlington Way) should link the village to the Garden Centre, the Church and Thetford Tescos and beyond. The Brettenham Road is becoming very dangerous with the	Agree. Path has been added to list of projects under JNP.8 (formerly JNP7)	Include in text under JNP.8 (para 4.36)

				amount of traffic and pedestrians using it.		
85	Page 36 JNP6 Transport and Highway Safety  5 <sup>th</sup> para	REG14/006/B DC/048	Breckland Council	Suggest rewording to:  “New development should be designed to discourage speeding traffic and ensure that it avoids the risk of, creation of “rat runs” <del>or</del> and to adding <del>to</del> significant amounts of traffic movements <del>or</del> speeding on rural roads elsewhere in the parishes.	Agree. Incorporate new wording	Reword as follows:  “New development should be designed to discourage speeding traffic, creation of “rat runs” and to adding significant amounts of traffic movements on rural roads in the parishes.
86	Page 36 JNP6 Transport and	REG14/006/B DC/049	Breckland Council	Add in thresholds. If there are specific routes which have problems, identify them and how issues prevented	Two specific routes are problematic in Brettenham and Kilverstone.	New wording has been inserted at Paragraph 4.27

	<b>Highway Safety</b> <b>6<sup>th</sup> para</b>				<p>The C147 through Rushford where traffic surveys and some speed monitoring has taken place which shows a 10% increase in traffic volume and discussions are on-going in respect of solutions. The C148 Brettenham to Kilverstone Road has also seen an increase in traffic and speeds but this may be exacerbated currently by drainage works taking place in Bridgham which has resulted in a road closure. Therefore, it is not currently possible</p>	
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					<p>to obtain reliable data.</p> <p>In Croxton, "The Street" has been the subject of discussions re traffic calming measures to reduce speeds and it is anticipated that speed limit flashing signs will be investigated subject to funding.</p>	
<b>87</b>	<p><b>Page 36</b> <b>JNP6</b> <b>Transport and Highway Safety</b> <b>6<sup>th</sup> para</b></p>	<b>REG14/006/B DC/050</b>	<b>Breckland Council</b>	Add in thresholds. If there are specific routes which have problems, identify them and how issues prevented	See above	See above

88	<p>Page 36 JNP6 Transport and Highway Safety</p> <p>7<sup>th</sup> para, 1<sup>st</sup> sentence</p>	REG14/006/B DC/051	Breckland Council	Replaced “avoid” with “manage”	Agree.	Replace “avoid” with “manage”
89	<p>JNP6 Transport and Highway Safety</p>	REG14/010/TT C/014	Thetford Town Council	<p>We welcome the reference to safe pedestrian footpaths and wherever possible, these should be combined with cycle paths</p> <p>Footpaths and cycle paths should be of a suitable capacity to deal with the flow of traffic once the SUE is complete</p>	Comments noted. We would add in the requirement to be disability compliant.	No change to Plan
90	<p>Page 36 Para 4.19</p>	REG14/010/TT C/007	Thetford Town Council	<p>A suitable cycle way to Thetford Academy is required to fit the needs of the residents of the SUE and surrounding villages.</p> <p>Upgrade Joe Blunts Lane as referenced in retained TH12 The Thetford Loops</p>	This issue is already covered by the TAAP in Policy TH12 and 11 which are proposed to be retained by Breckland Council. However, it could be mentioned in	Include new wording to refer to Joe Blunts Lane as a protected green route

					the supporting text.	
<b>91</b>	<b>4.18</b>	<b>REG 14 /001/CLAYDON - 003</b>	<b>Leah Claydon</b>	Rat runs – Croxton would benefit from traffic calming measures such as a speed sign – LED type displaying speed/smiley face and possibly a single carriage passing give way gate(?) at either of the village to prevent excessive speeding on the high street.	See response to BDC above  REG14/006/BDC/049  In Croxton, “The Street” has been the subject of discussions re traffic calming measures to reduce speeds and it is anticipated that speed limit flashing signs will be investigated subject to funding	See above.  REG14/006/BDC/049
<b>92</b>	<b>Community facilities (JNP 7)</b>	<b>REG 14/002/FISHER-004</b>	<b>Kay Fisher</b>	Either in Kilverstone Village or very nearby there should be Health Centre/Drs surgery. It will be difficult for residents here to be allocated health provision as both	The PCs have sympathy with this comment.  This is being considered by the GTDP Board and	Amendments made to supporting text

				<p>surgeries in Thetford are oversubscribed.</p>	<p>discussions taking place with the Norfolk Director of Public Health who should identify and quantify the need to support the 5,000 new homes and then ask NHS Midlands and East to provide it. There is land earmarked for this in the SUE outline application but only £178k in the S106 agreement. Neither of the PCs had the opportunity to input into the S106.</p>	
93	4.20	REG 14/ 001/CLAYDON - 004	Leah Claydon	<p>IMO – Primary Care Facilities are a priority and any development should not be permitted to</p>	<p>See response to 002/FISHER/002 above.</p>	See above

				<p>commence without appropriate funding being in place for this.</p>	<p>The PCs have sympathy with this comment.</p> <p>This is being considered by the GTDP Board and discussions taking place with the Norfolk Director of Public Health who should identify and quantify the need to support the 5,000 new homes and then ask NHS Midlands and East to provide it. There is land earmarked for this in the SUE outline application but only £178k in the S106 agreement. Neither of the PCs had the opportunity to</p>	
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					input into the S106.	
94	<b>Community Facilities (JNP 7)</b>	<b>REG14/003/ Sport England -001</b>	<b>Sport England</b>	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>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</p>	<p>Comments noted.</p> <p>Responses to the Questionnaire in 2015 highlighted sport facilities, playing fields and play areas as well as informal open spaces as being priorities for the community in terms of new facilities.</p> <p>The permission granted for the outline on the SUE site does include Strategic Open Space and Local Open Space</p>	No change to Plan

				<p>to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. 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 Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.</p> <p><a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be</p>	<p>although there are no formal new facilities identified at this stage.</p> <p>In addition, a new policy has been added to protect Local Green Spaces (JNP14)</p> <p>Should additional funding or site based opportunities arise, during the course of the Plan period, the Parish Councils will focus their efforts towards delivering these priorities in accordance with Local Plan policies and this guidance.</p>	
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			<p>found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a</p>		
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				<p>neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation</p>		
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			<p>of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports</p>		
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				<p>facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and</p>		
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				<p>developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p>		
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				<p>PPG Health and wellbeing section:  <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance:  <a href="https://www.sportengland.org/active-design">https://www.sportengland.org/active-design</a></p>		
95	Community Facilities (JNP7)	REG14/005/N CC/003	Norfolk County Council	The County Council supports POLICY JNP7: Community Facilities (pages 37 and 38) specifically the reference to housing and other developments contributing to local services and infrastructure through S106 agreements and/or CIL.	Comments noted	No change to Plan
96	Community Facilities (JNP7)	REG14/005/N CC/004	Norfolk County Council	<p>The neighbourhood plan should consider the following;</p> <p>Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments.</p>	Agreed, this is a new issue emerging.	Amend Plan policy and supporting text to include reference to sprinklers in all new developments

				<p>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. The neighbourhood plan should therefore have policies referencing the delivery of the above infrastructure, which could be included on page 38.</p>		<p>on page 38 Para 4.22.</p>
97	<p><b>P37 JNP7 Community /Existing Facilities</b></p>	<p><b>REG14/006/B DC/052</b></p>	<p><b>Breckland Council</b></p>	<p>Needs a definition in the text showing the range e.g. pub, shop etc</p>	<p>Agree. Insert additional text in 4.20 to outline what community facilities are.</p>	<p>Insert additional text at 4.20 defining community facilities</p>
98	<p><b>P37 JNP7 Community /Existing Facilities</b></p> <p><b>1<sup>st</sup> para criteria a b and c</b></p>	<p><b>REG14/006/B DC/053</b></p>	<p><b>Breckland Council</b></p>	<p>Delete criteria a b and c as it duplicated Policy COM in the adopted Plan</p>	<p>Do not agree. The issue of community facilities is the single most mentioned issue throughout consultations. By removing these criteria, the JNP would not have</p>	<p>No change to Plan.</p>

					any reference to existing facilities and it is considered that this would undermine the value the community places on its existing facilities.	
99	JNP 7 Community Facilities	REG14/008/H E/012	Historic England	As you are aware, based on the inclusion in the JNP of Policy JNP7, communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their designated area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can	Comments noted however there is currently no CIL in force in the JNP area.	No Change to Plan

				<p>have access to this money or influence how it is spent through the neighbourhood plan process. Historic England recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a></p>		
<b>100</b>	<b>New Facilities</b>	<b>REG14/006/B DC/054</b>	<b>Breckland Council</b>	<p>Add in thresholds for securing obligations; refer to more detailed/considered list of new projects to be put forward or if no detail then updated project list to be appended and monitored every 6 months/year/2 years</p>	<p>Comments noted although the detail of specific projects is not yet known.</p> <p>Additional wording to be included in the text</p>	<p>Include wording relating to project list within the supporting text.</p>



<b>101</b>	<b>1<sup>st</sup> para</b>	<b>REG14/006/B DC/055</b>	<b>Breckland Council</b>	Suggest rewording to reflect CIL tests	Comments noted. See below	See below
<b>102</b>	<b>2<sup>nd</sup> para</b>	<b>REG14/006/B DC/056</b>	<b>Breckland Council</b>	Either delete or reword so where there are funds/contributions these shall be directed towards those priorities set out in the JNP or otherwise required by policies in the Local Plan	Agree this needs rewording along the lines suggested	Include additional text as suggested
<b>103</b>	<b>3<sup>rd</sup> para</b>	<b>REG14/006/B DC/057</b>	<b>Breckland Council</b>	Add to an amended SUE policy	This policy is to apply throughout the JNP area. Although most development is planned to take place in the SUE, whilst there is a shortfall in 5-year land supply in the District then other applications for development may come forward that may either generate a need for additional facilities or contribute towards	No change to Plan

					them. e.g.3PL/2017/0578 /O	
<b>104</b>	<b>JNP7 Community Facilities</b>	<b>REG14/010/TT C/015</b>	<b>Thetford Town Council</b>	<p>This is referred to under retained TH23. Groups of farm buildings give ideal opportunity for redevelopment into community hubs and we are aware that interest exists for this. The NP should therefore be the source of vision for this.</p> <p>We would have expected a detailed vision of how existing buildings in SUE can be redeveloped to provide a historic hub. Something that worked very successfully in Moreton Hall near Bury St Edmunds</p>	Policy TH23 already identifies some of the existing farm buildings within the SUE area as “undesignated heritage assets of local interest” and supports the principle of them being re-used for community benefit. Given the TAAP policies and the outline permission it is unclear what additional policy guidance the JNP would be expected to provide.	No change to Plan
<b>105</b>	<b>Page 39 JNP8</b>	<b>REG14/006/B DC/058</b>	<b>Breckland Council</b>	Provide further detail in the policy wording. Consider outlining	Policy doesn't refer to significant	No change to policy

	<b>Employment</b>			exceptions and defining significant employment sites	employment sites. Employment in this area is small scale.  Supporting text already identifies which sites are covered by the policy at 4.26	
<b>106</b>	<b>Page 39 JNP8 Employment  2<sup>nd</sup> para</b>	<b>REG14/006/B DC/059</b>	<b>Breckland Council</b>	“provided they do not have a significant adverse impact upon the character of the area or the amenity of residents”	Agree to amend wording consistent with preceding paragraph	Insert “have a significant adverse” before impact in the 2 <sup>nd</sup> paragraph.
<b>107</b>	<b>JNP8 Employment</b>	<b>REG14/010/TT C/016</b>	<b>Thetford Town Council</b>	Thetford Garden Centre and Tescos are in the town of Thetford and not Kilverstone.  Amend  There are areas of Kilverstone that are not in the SUE settlement boundary, but still provide an opportunity for employment in a	See response to REG14/010/TTC/002 above  No specific areas are mentioned but the policy is intended to allow for new employment	Add new wording to refer to the reuse of existing buildings.

				historic environment, through the reuse of historic buildings	subject to certain criteria also with extensions to existing employment sites. Agree to add wording in respect of re-use of existing buildings.	
<b>108</b>	<b>P39 para 4.24</b>	<b>REG14/006/B DC/060</b>	<b>Breckland Council</b>	Suggest that either here or on page 16 regarding Croxton that mention is made of the Thetford Enterprise Park and its potential to provide significant local employment	Agree.	Insert reference to Thetford Enterprise Park in para 4.24
<b>109</b>	<b>P40 JNP 9 Strategic Gaps</b>	<b>REG14/006/B DC/061</b>	<b>Breckland Council</b>	Remove maps and references to it and change policy to “avoiding the coalescence of settlements”. The nearby SUE addresses the growth for Thetford so no additional pressure for further growth in the area within the plan period and new housing would be contrary to other policies for the vast majority of the designated areas	Agree that more rationale needs to be included in the supporting text however, do not agree with points about no pressure for additional growth when there is a current application in Brettenham 3PL/2017/0578/O	Policy has been renamed “Avoiding the coalescence of settlements” and further text added to the reasoned justification

					that is proposing 115 new units and is outside of the SUE and ironically may be recommended for approval. The lack of a 5-year land supply in Breckland means that there remains additional pressure for growth in the area.	
<b>110</b>	<b>P40 JNP 9 Strategic Gaps</b>	<b>REG14/006/B DC/062</b>	<b>Breckland Council</b>	If the map is to be retained there must be clear evidence. Also have a much narrower strip combining the two areas	Agree the text needs strengthening however there is a clear justification and a clear threat of unplanned growth in the area due to a lack of a 5year land supply	See above
<b>111</b>	<b>JNP 9 3<sup>rd</sup> para 1<sup>st</sup> sentence</b>	<b>REG14/006/B DC/063</b>	<b>Breckland Council</b>	Remove and amend text regarding the objective	Agree remove from policy and insert into	Remove text from policy and insert in para 4.26.

					reasoned justification at 4.26	
112	Page 41 Reasoned Justification	REG14/006/B DC/064	Breckland Council	Further reasoning and detailed area appraisals are required to justify the gaps or amend the gaps or remove the policy	Agree supporting text needs strengthening. See also responses to REG14/006/BDC/061, 062 and 063 above	See above
113	Page 41 2 <sup>nd</sup> para d	REG14/006/B DC/065	Breckland Council	Amend to “prevent the coalescence of settlements within the <b>gaps where planning permission is required</b> approval will only be given for the construction of”	This policy (and the whole of the JNP policies) can only apply where development requiring the benefit of planning permission is proposed. Therefore, this is unnecessary to include such reference here.	No change to Plan
114	P42 Map 6	REG14/006/B DC/066	Breckland Council	There is no reference in the key to the map as to which gap is which.	Agree the key needs to reflect this.	Amend Map key

<b>115</b>	<b>4.30 (JNP10)</b>	<b>REG14/005/N CC/007</b>	<b>Norfolk County Council</b>	Norfolk County Council welcome the inclusion of paragraph 4.30 (page 41) within the Neighbourhood Plan and the factual reference to the safeguarded sand and gravel mineral resource and the Minerals and Waste Core Strategy Policy CS16.	Comments welcomed.	No change to Plan
<b>116</b>	<b>P43-48 JNP10, 11, 12, 13 and 14</b>	<b>REG14/006/B DC/067</b>	<b>Breckland Council</b>	Clearly define the areas that the policy applies to	Agree. Clarification in text and on maps	Amend text and maps
<b>117</b>	<b>JNP10 and 13</b>	<b>REG14/008/H E/008</b>	<b>Historic England</b>	We also welcome that, in Policies JNP10 and 13 the JNP recommends buildings for inclusion in a District Council level list of local heritage assets. Although we appreciate that buildings are often the most common and easily identified form of non-designated heritage asset, there are often other features and	Support for the approach taken by the JNP is welcomed. It is considered that the Character Surveys have picked up the features that are	No change to Plan

				structures that make an important contribution to the character of a place. Examples could be elements such as historic road verges, village ponds, un-listed war memorials etc. If considered important, therefore, the JNP could identify these features in addition to those buildings already highlighted, and afford them a level of protection.	considered to be of heritage value and require protection. However, there may be additions in a future review e.g. The Pill Box in Rushford has been added as a result of other representations.	
<b>118</b>	<b>P43-48 JNP10, 11, 12, 13 and 14</b>	<b>REG14/006/B DC/068</b>	<b>Breckland Council</b>	Reflect the findings of the character appraisal in the policy wording in greater detail. Consider the use of more specific design measures in the policy and improvements and enhancements linked to the Character Appraisal	Agree more detail from the Character Appraisal would be useful here and text has been amended accordingly	Amend text to include conclusion from the Character Appraisal.
<b>119</b>	<b>P43-48 JNP10, 11, 12, 13 and 14</b>	<b>REG14/006/B DC/069</b>	<b>Breckland Council</b>	Ensure that it is clear which area or feature is being referred to in each policy by defining areas the policy applies to on the maps in Appendix A	Agree this could be made clearer.	Maps to be amended



<b>120</b>	<b>Page 43 Policy JNP10 Croxtan Character Appraisal</b>	<b>REG14/006/B DC/070</b>	<b>Breckland Council</b>	Provide additional photos or examples of materials. Also, additional text on local and national policy justification.	Agree more detail from the Character appraisal could be used here and photographs of the non- designated heritage assets included	Photographs have been added to support the policy
<b>121</b>	<b>Page 43 Policy JNP10 Croxtan Character Appraisal  3<sup>rd</sup> para</b>	<b>REG14/006/B DC/071</b>	<b>Breckland Council</b>	Replace undesigned with non-designated	Agree.	Replace undesigned with non- designated
<b>122</b>	<b>Page 43 Policy JNP10 Croxtan Character Appraisal  4th para</b>	<b>REG14/006/B DC/072</b>	<b>Breckland Council</b>	Policy should not lobby Council. Move to text	Comments noted. Wording moved from policy into supporting text.	Remove wording from policy and include in supporting text
<b>123</b>	<b>Page 45 Policy JNP11</b>	<b>REG14/006/B DC/073</b>	<b>Breckland Council</b>	Include a list of what measures may assist in enhancements e.g. landscaping and planting, footpath	It is proposed to remove reference to the Vicarage in	Photographs added, and text amended to refer

	<b>Croxton Areas for Enhancement</b>			and signage improvements. This could then link to a community project list and obligation monies via CIL. Include site specific characteristics, design principles for any scheme at the Vicarage	this policy and concentrate on the southern gateway enhancements for which additional text has been added including photographs.	to southern gateway enhancements and to exclude the Vicarage
<b>124</b>	<b>JNP 11 and 14</b>	<b>REG14/008/HE/009</b>	<b>Historic England</b>	We welcome Policies JNP11 and 14 that identify areas for enhancement within the JNP area, and support their general ambitions. In addition to the buildings and sites identified, we suggest that the JNP could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at their enhancement as well. I would be happy to advise further on these points.	Support welcomed.  The findings of the Character Appraisal work, indicated that the heritage assets were generally in good condition. The Almshouses in Kilverstone are subject to their own policy which is specifically aimed at enhancement (JNP15)	No change to Plan

125	Page 46 JNP12  Kilverstone Alms Houses	REG14/006/B DC/074	Breckland Council	Suggest an overarching policy objective then a series of criteria for which any development proposals would subsequently have to meet. Also, a set of criteria for when redevelopment/demolition would be allowed i.e. when supported by RICS etc.	Policy wording has been revised.	Policy wording amended
126	1 <sup>st</sup> para	REG14/006/B DC/075	Breckland Council	Stray *	Typo – should be (	Remove * replace (
127	1 <sup>st</sup> para	REG14/006/B DC/076	Breckland Council	Define affordable housing in the justification, suggest referring to the definition contained with NPPF as this allows for flexibility if national definition changes over time	Agree. Amend text accordingly	Amend text
128	1 <sup>st</sup> para	REG14/006/B DC/077	Breckland Council	Need reference to which character area map applies	Agree. Location of Almshouses needs to be on a map	Character Area Map will show location of Almshouses
129	Pg 47 JNP13  Brettenham & Kilverstone	REG14/006/B DC/078	Breckland Council	Provide additional photos or examples of materials. Also, additional text on local and national policy justification.	Agree more detail from the Character appraisal could be used here and text	Amend text to include photos

	<b>Character Appraisal</b>				amended accordingly	
<b>130</b>	<b>4<sup>th</sup> para</b>	<b>REG14/006/B DC/079</b>	<b>Breckland Council</b>	Policy should not lobby Council. Move to text	Comments noted. Wording moved from policy into supporting text.	Remove wording from policy and include in supporting text
<b>131</b>	<b>JNP13</b>	<b>REG14/006/B DC/080</b>	<b>Breckland Council</b>	Ensure that it is clear which area or feature is being referred to in each policy by defining areas the policy applies to on the maps in Appendix A	Agree this could be made clearer.	Maps to be amended
<b>132</b>	<b>JNP13 – Brettenham and Kilverstone Character Appraisal</b>	<b>REG14/009/C WPC/002</b>	<b>Coney Weston Parish Council</b>	Support the aspiration to visually enhance the area around the scheduled bridge over the Little Ouse into the village from the east on the C148 and the protection of the open space forming the green. Also, the inclusion of the list of assets of historic importance locally	Support welcomed	No change to Plan
<b>133</b>	<b>JNP13 – Local List for Brettenham</b>	<b>REG14/009/C WPC/002</b>	<b>Coney Weston Parish Council</b>	As the WW2 MT shed is proposed to be included on that list would it not be logical to also include the Pill Box in the wood to the west of Farthingale House which as	Support welcomed. Agree to add the Pill Box to the Local List	Add Pill Box to Local List

				presumably placed to provide defence to the strategic crossing point.		
<b>134</b>	<b>Pg49 JNP14 Areas for Enhancement in B &amp; K</b>	<b>REG14/006/B DC/081</b>	<b>Breckland Council</b>	Include a list of what measures may assist in enhancements e.g. landscaping and planting, footpath and signage improvements. This could then link to a community project list and obligation monies via CIL. What types of development would be supported?	Agree more detail here would be useful and additional text has been included at 4.78 and 4.79	Paragraphs 4.78 and 4.79 amended
<b>135</b>	<b>Page 49 Areas for Enhancement in B &amp; K</b>	<b>REG14/010/TT C/008</b>	<b>Thetford Town Council</b>	Supportive of enhancing this site but consideration should be given to the adjacent recreational space.  This could be used as a coach park for visitors, however this would need a new footpath by former Bridge Public House	Comments noted.  Reference to the potential to use the site for coach parking as a temporary or interim used to be included in the supporting text.	Amend Plan accordingly
<b>136</b>	<b>Pg49 JNP14 Areas for Enhancement in B &amp; K</b>	<b>REG14/006/B DC/082</b>	<b>Breckland Council</b>	Define the disused railway station on the map	Agree. Location of disused station needs to be on a map	Amended Maps required

137	Pg49 JNP14 Areas for Enhancement in B & K	REG14/006/B DC/083	Breckland Council	Define the Brettenham West/Arlington Way Character Area on Map 9  This applies to all character areas	Agree, this need reviewing for clarity	Amended Maps required
138	Local Green Spaces	REG14/008/H E/010	Historic England	Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <a href="https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces">https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces</a> .	Agree that the protection of green spaces identified in the Character Appraisal has not translated into policy.  Additional policy required (JNP14)	New policy JNP14 relating to green spaces has been devised.
139	Assets of Community Value	REG14/008/H E/011	Historic England	You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of	Comments noted	No change to Plan

				<p>Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <a href="http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/">http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/</a></p>		
<b>140</b>	<b>P51 Appendix A</b>	<b>REG14/006/B DC/084</b>	<b>Breckland Council</b>	Reduce the size of the text to be consistent with the plan	Text to be revised	Text size revised
<b>141</b>	<b>P52-56 Map 7-11</b>	<b>REG14/006/B DC/084</b>	<b>Breckland Council</b>	Define the areas the policies refer to, to ensure policy and supporting text make clear the justification for the character area. The maps should show the full extent of the character areas.	Maps to be reviewed	Amended maps required

<b>142</b>	<b>Glossary</b>	<b>REG14/008/H E/015</b>	<b>Historic England</b>	We recommend the inclusion of a glossary containing relevant terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets enjoy	Comments noted. Glossary to be added as Appendix C	Add glossary as Appendix C
<b>143</b>	<b>Additional Points</b>	<b>REG14/010/TT C/017</b>	<b>Thetford Town Council</b>	There should be some means to ensure the overall vision and aims of the SUE are achieved	No specific detail is suggested. The JNP will assist in the delivery of the agreed SUE vision and SUE policy has been revised as a consequence of other representations	No change to Plan
<b>144</b>	<b>Additional Points</b>	<b>REG14/010/TT C/018</b>	<b>Thetford Town Council</b>	There is no cemetery provision, and this is required, as non-parishioners cannot be buried in Thetford	The SUE shows in Phase 5 the provision of a cemetery which can be bought forward as a need has been established	Supporting text amended accordingly



<b>145</b>	<b>Additional Points</b>	<b>REG14/010/TT C/019</b>	<b>Thetford Town Council</b>	NP does not refer to the potential development in Brettenham, which has been highlighted by a recent planning application from Shadwell Estate	Text referring to the application has been included in Policy JNP11	Revised text for JNP 11 (formerly JNP9)
<b>146</b>	<b>Additional Points</b>	<b>REG14/010/TT C/020</b>	<b>Thetford Town Council</b>	There is no reference to traditional parish roles. When completed the size and population of the SUE will be similar in size to a town like Swaffham and would require a similar level of council responsibility. With an indicative annual precept of £300-400k per annum the NP needs to address how this would be administered. By the PCs	Comments noted. This is not a matter for the JNP	No change to Plan
<b>147</b>	<b>Additional Points</b>	<b>REG14/010/TT C/021</b>	<b>Thetford Town Council</b>	NP makes no reference to the allotments and their management.	This refers to the requirements of the S106 to which the Parish Councils did not have an opportunity to influence. However, if	No Change to Plan

					allotments are allocated within the PC areas then they would manage them.	
<b>148</b>	<b>Additional Points</b>	<b>REG14/010/TT C/022</b>	<b>Thetford Town Council</b>	NP makes no reference to the play areas and their management	This refers to the requirements of the S106 to which the Parish Councils did not have the opportunity to influence. However, if play areas are allocated within the Parish Council areas they will manage them	No Change to Plan
<b>149</b>	<b>Additional Points</b>	<b>REG14/010/TT C/023</b>	<b>Thetford Town Council</b>	NP makes no reference to extending of graveyards to accommodate the approx. extra 100 deaths a year when the SUE is complete as above – perhaps we should include this after talking to Pigeon	See response to REG14/010/TTC/018 above	No change to Plan

<b>150</b>	<b>Additional Points</b>	<b>REG14/010/TT C/024</b>	<b>Thetford Town Council</b>	NP makes no reference to the management of footway lighting	This refers to the requirements of the S106 to which the Parish Councils did not have the opportunity to influence. However, if these items are allocated within the Parish Council areas the PCs would manage them.	No Change to Plan
<b>151</b>	<b>Additional Points</b>	<b>REG14/010/TT C/025</b>	<b>Thetford Town Council</b>	This NP was discussed, in respect of its possible relevance to the governance review decision	Noted.	No change to Plan

