

Responses to the Regulation 14 Consultation and Actions Taken as a Result

This Consultation Statement sets out our approach to engagement and consultation in the development of the Buxton with Lamas Parish Neighbourhood Plan and demonstrates the reach and results of the Regulation 14 (Pre-submission) Consultation held in May/June 2023.

Name	My comment is:	CONSULTATION STATEMENT RESPONSE
------	----------------	---------------------------------

[BwL](#)
[PARISH](#)
[COUNCIL](#)
[L](#)

Following wording agreed by BwLPC in October 23 and ratified at the subsequent meeting of the council on November 20th 2023.

CHAPTER 7 -

Monitoring and Delivery of the Neighbourhood Plan

Delivery

1. Scrutinise each planning application against a check sheet to be developed by the council.
2. The whole council is responsible for ensuring the plan is deployed where required during meetings.
3. Keep under review the community projects set out in Chapter 6: Community projects which fall outside the scope of this plan
4. Ensure the plan is on the council website and promote it annually in The Round.
5. Ensure new councillors, district councillors and any other parties are given a copy of the Plan, at least digitally, during induction and are guided on the role of this plan in the parish.
6. Have a paper copy of the plan available at all meetings of the council, at request, for members and the public to read or refer to.

Actioned

Monitoring

1. Monitor the planning decisions by the local planning authority with respect to the use of the NP policies, follow up where necessary and maintain an audit for the purpose of reporting back to the parish council (see 2 below).

2. Report annually on the effectiveness of the plan, for example with metrics and commentary on how and when it has been used, the outcomes and lessons learned (ie planning decisions made which either support or did not support the policies within the plan).

Review

1. Review the NP when deemed necessary (either through annual reporting or in response to advice from Broadland District Council that changes to national/local planning require a review); and subject to resources being available.

[Esco Developments 01](#)

BUXTON WITH LAMAS PARISH NEIGHBORHOOD PLAN 2021 – 2040 - REPRESENTATION ON BEHALF OF ESCO DEVELOPMENTS.

1. INTRODUCTION

Savills (UK) Ltd is instructed by ESCO Developments (ED), land promotor of the site - land east of Aylsham Road, Buxton, and act on behalf of the land owners to submit a representation on the Regulation 14 plan, Buxton with Lamas Parish Neighbourhood Plan 2023 - 2038 (pre-submission version), which is subject to consultation until the 23rd June 2023.

ESCO Developments very much welcomes the Parish Council taking the initiative and preparing a Neighbourhood Plan to positively shape the future of its area. ESCO Developments, as the party acting on behalf of the land owners of the land east of Aylsham Road in Buxton, which is allocated for residential development (Policy GNLP0297) in the emerging Greater Norwich Local Plan, is currently working on bringing forward a housing scheme on the site with careful consideration being given to the characteristics of Buxton, the quantum of development, the housing mix, density and design requirement. They are looking to deliver a scheme to support Buxton with Lamas Parish's vision and objectives, and tackle the key issues to provide sufficient affordable housing and access for rent/buy for first time buyers.

ESCO Developments are pleased to see the Neighbourhood Plan carries forward the aspirations for this site from the emerging GNLP and recognise the housing need of the village as demonstrated by the 2018 Neighbourhood Plan Survey for new homes in the

Noted with thanks

parish and with 60% of the surveyed population considering that, where new homes are provided, affordable homes should be provided, to be available for first time buyers or for rent.

With the consideration of the policy context for the preparation of Neighbourhood Plan which is set out in the section below, ESCO Developments would like to make the following comments on Section 3 of the draft Neighbourhood Plan.

2. POLICY CONTEXT FOR PREPARATION OF NEIGHBOURHOOD PLAN

For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the National Planning Practice Guidance (PPG).

The basic conditions are:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).

1.

Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.

2.

Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.

3.

The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

4.

The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

5.

The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

6.

Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)."

The PPG adds at paragraph 040 (Reference ID 41-040-20160211) that

"...proportionate, robust evidence should support the choices made and the approach taken" by a Neighbourhood Plan by a Neighbourhood Plan and in respect of their preparation, states that: "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared." [Reference ID: 41-041-20140306].

The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by

"proportionate evidence....on how the draft neighbourhood plan or order guides development to sustainable solutions" (paragraph 072 Reference ID: 41-072-20190509).

This guidance is relevant to the following specific comments. Please note that separate comments on relevant policies are set out on individual sections.

[

Comments separated into sub-items]

We trust these comments are helpful as the Council looks to finalise its submission draft of the NP. Please do not hesitate to contact me in the first instance should you have any questions in relation to the above matters raised. ESCO Developments supports the draft Neighbourhood Plan subject to small improvements and are very happy to cooperate and ensure that Buxton can (continue to) be a vibrant, inclusive community. We would very much welcome an opportunity to meet with the Parish Council in due course to discuss any matters in relation to land east of Aylsham Road to help deliver a successful neighbour plan.

[Esco Developments 02](#)

3. COMMENTS ON THE NEIGHBOURHOOD PLAN

To this end, we

SUPPORT:

The Vision, Themes and Objectives

ESCO Developments fully support the NP's vision which supports the villages to be a vibrant, inclusive community and nestled in a tranquil rural setting. We also support the Themes/Objectives set out in the NP to deliver limited sustainable growth in Buxton, protecting and strengthening parish character and supporting sustainable design. ESCO Developments consider that the NP provides a balanced vision and objectives which sets out overarching strategies compliant with the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) stated above.

Noted with thanks.

[Esco](#)
[Develop](#)
[ments 03](#)

Policy BUX1- A strategy for limited and sustainable growth

ESCO Development particularly supports policy BUX1. This policy provides a clear spatial strategy for development in this area which, as required, is broadly consistent with the strategic policies in the currently adopted Local Plan and is also consistent with the emerging GNLP policies in relation to Buxton with Lamas Parish. It focuses developments towards Buxton Village and sites allocated for development as part of the development plan, and restricts development that is outside these areas. The supporting text of the policy recognises the previous site adjacent to the settlement boundaries allocated for housing development and references that the emerging GNLP brings a further site forward for development on land east of Aylsham Road for approximately 40 dwellings. This policy supports residential development outside settlement boundary on sites allocated for development as part of the development plan and supports other rural exceptional sites to meeting identified local needs for affordable housing. We consider the development strategy set out in the policy is sensitive to Buxton's defining characteristics as a village and also gives considerations to housing needs in this area. It is important that the NP continues to support residential development on sites outside the settlement boundary which have been allocated for development as part of the development plan.

Noted with thanks.

[Esco Developments 04](#)

We also recognise that a neighbourhood plan should provide a holistic sustainable approach to development, and therefore also **SUPPORT** the following policies subject to **AMENDMENTS.**

Policy BUX 4 – Development and Design

This policy emphasises that a design-led approach should be taken for all proposals, and to support this the Parish prepared a Design Guidance and Codes, including the Design Codes specific to ten character areas. It requires that the design of proposals within each defined character area should be guided by the design codes identified by variations in the built form and architectural details, pattern of development, building line/plot arrangement etc. of that area.

We praise the approach the Parish has made in order to provide a design-led approach promoted by National Design Guide and the NPPF. We consider the Design Guidance and Codes set out detailed criteria and generally provide a balanced guidance for future development proposals to follow in order to protect the characteristics of the villages.

Noted with thanks. Clause 1 now provides further clarity with regards expectations on design codes to be followed for the allocated sites. Note the policy and the Design Guide itself have been amended in light of other comments.

However, this policy and the Design Guidance and Code do not make reference to the allocated housing sites. Currently, the two allocated housing sites are both located in the open countryside, hence fall within the character area: CA10 – Countryside. It will not be possible to design the two housing developments in compliance with characters set out under the Countryside area in the Design Codes. Therefore,

we consider this policy can and needs to be amended by adding design guidance specifically for the two allocated housing sites. This would be achieved by requiring that the design of housing allocations should carefully consider the characteristics of the adjacent settlement area such as CA 01 – Buxton: Aylsham Road for the allocation site – Land east of Aylsham Road. Furthermore, whilst we would agree that proposals should respect (rather than necessarily just copy) the prevailing character of buildings in the vicinity of a development site, the policy should also be amended to specifically reflect the wording of paragraph 130c) of the National Planning Policy Framework and recognise that developments should be “...sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...” (*our underlining*).

This policy also sets out a list of design principles to be compliant with. Criteria c) of the requirements for Building Form states that all back gardens in the parish should have a minimum depth of 10m and provide a minimum area of 50m². We consider this size requirement is reasonable within the context of the parish, as most houses within the

	<p>parish have gardens of at least these dimensions and a rural setting should be maintained by providing generous gardens.</p>	
--	---	--

[Esco](#)
[Develop](#)
[ments 05](#)

Policy BUX 6 – Protecting and Enhancing Landscape Character

We support the three landscape character areas defined in the NP, which are derived from the Broadland Landscape Character Assessment 2013. We consider Appendix 3 which provides detailed descriptions for landscape sensitivities and features sets out clear directions for future proposals to consider and incorporate into their design.

Paragraph 5.6.7 recognises the housing allocation at the edge of the Buxton village, and requires any future design of the housing scheme to protect the village setting by incorporating generous landscape buffers. We support this requirement and also consider this is a reasonable requirement to protect the character of the adjacent open countryside. ESCO Developments would look to incorporate this requirement into the design of the housing scheme at land to the east of Aylsham Road and deliver a scheme to respect the village setting and landscape characters of area - A2 : River Bure river valley.

Noted with thanks.

[Esco](#)
[Develop](#)
[ments 06](#)

Policy BUX 8 – Views to be Protected

We support the priority views and local iconic views set out in Map 11 and 12 and Appendix 1 which provides detailed descriptions of the views. This is compliant with paragraph 174 of the NPPF which requires development proposals to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. However, we consider this policy can be improved to be consistent with the spatial strategy set out in the NP to recognise the two housing allocations in Buxton village and make comments on how the design of housing allocation sites can protect the identified views located adjacent.

ESCO Developments respect that the allocated site on land east of Aylsham Road is located close to the designated iconic view S and would incorporate a design of the future housing development to respect the key view. Notwithstanding this, in order to be compliant with PPG para. 040 (Reference ID 41-040-20160211) which requires a policy in a neighbourhood plan to be clear and unambiguous and drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications, we believe additional contents can be added to provide guidance on how the key views (priority views and iconic views) can be protected as a result of the housing schemes at the two strategic housing allocations in Buxton village.

Information in the supporting text and appendix has been expanded to provide further clarity regarding expectations on views that are potentially impacted by development proposals.

[Esco
Develop
ments 07](#)

Policy BUX 13 – Delivering Biodiversity Net Gain

The supporting text of the policy emphasises the Environment Act’s mandated minimum measurable Biodiversity Net Gain (BNG) for all developments. This requires that the biodiversity value of the development exceeds the pre-development biodiversity value of the site by a minimum of 10%. Policy 3 in the emerging GNLP also requires that all developments deliver a net gain in biodiversity of at least 10%. However, the policy does not mandate a 10% minimum biodiversity net gain, instead it only requires a measurable biodiversity net gain. Although this requirement does not directly conflict with the Environment Act’s minimum 10% BNG, this would potentially set up two sets of rules which essentially raise confusion for future developments. Therefore, we consider a clarification should be added to the policy to reference the requirement for a gain in line with the Environment Act (or successor legislation).

BUX 13 amended: “1. Development proposals will be required to demonstrate a measurable minimum of 10% net gain for biodiversity, or more in line with the Environment Act or successor legislation.”

[Esco](#)
[Develop](#)
[ments](#)
[FULL](#)

23 June 2023

Buxton with Lamas Parish Council

Dear Sirs,

Andy Moffat E: andy.moffat@savills.com DL: +44 (0) 1223 347 046

Unex House 132-134 Hills Road Cambridge CB2 8PA

T: +44 (0) 1223 347 000

F: +44 (0) 1223 347 111

savills.com

1.

INTRODUCTION

Clause amended to say: 1. Development proposals will be required to demonstrate a measurable minimum of 10% net gain for biodiversity, or more in line with the Environment Act or successor legislation.

Savills (UK) Ltd is instructed by ESCO Developments (ED), land promotor of the site - land east of Aylsham Road, Buxton, and act on behalf of the land owners to submit a representation on the Regulation 14 plan, Buxton with Lamas Parish Neighbourhood Plan 2023 - 2038 (pre-submission version), which is subject to consultation until the 23rd June 2023.

ESCO Developments very much welcomes the Parish Council taking the initiative and preparing a Neighbourhood Plan to positively shape the future of its area. ESCO Developments, as the party acting on behalf of the land owners of the land east of Aylsham Road in Buxton, which is allocated for residential development (Policy GNLP0297) in the emerging Greater Norwich Local Plan, is currently working on bringing forward a housing scheme on the site with careful consideration being given to the characteristics of Buxton, the quantum of development, the housing mix, density and design requirement. They are looking to deliver a scheme to support Buxton with Lamas Parish's vision and objectives, and tackle the key issues to provide sufficient affordable housing and access for rent/buy for first time buyers.

ESCO Developments are pleased to see the Neighbourhood Plan carries forward the aspirations for this site from the emerging GNLP and recognise the housing need of the village as demonstrated by the 2018 Neighbourhood Plan Survey for new homes in the parish and with 60% of the surveyed population considering that, where new homes are provided, affordable homes should be provided, to be available for first time buyers or for rent.

With the consideration of the policy context for the preparation of Neighbourhood Plan which is set out in the section below, ESCO Developments would like to make the following comments on Section 3 of the draft Neighbourhood Plan.

2.

POLICY CONTEXT FOR PREPARATION OF NEIGHBOURHOOD PLAN

For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the National Planning Practice Guidance (PPG).

The basic conditions are:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).

1.

Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.

2.

Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.

3.

The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

4.

The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

5.

The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

6.

Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

The PPG adds at paragraph 040 (Reference ID 41-040-20160211) that

“...proportionate, robust evidence should support the choices made and the approach taken” by a Neighbourhood Plan by a Neighbourhood Plan and in respect of their preparation, states that: *“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”* [Reference ID: 41-041-20140306].

The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by

“proportionate evidence....on how the draft neighbourhood plan or order guides development to sustainable solutions” (paragraph 072 Reference ID: 41-072-20190509).

This guidance is relevant to the following specific comments. Please note that separate comments on relevant policies are set out on individual sections.

3.

COMMENTS ON THE NEIGHBOURHOOD PLAN

To this end, we

SUPPORT:

The Vision, Themes and Objectives

ESCO Developments fully support the NP's vision which supports the villages to be a vibrant, inclusive community and nestled in a tranquil rural setting. We also support the Themes/Objectives set out in the NP to deliver limited sustainable growth in Buxton, protecting and strengthening parish character and supporting sustainable design. ESCO Developments consider that the NP provides a balanced vision and objectives which sets out overarching strategies compliant with the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) stated above.

Policy BUX1- A strategy for limited and sustainable growth

ESCO Development particularly supports policy BUX1. This policy provides a clear spatial strategy for development in this area which, as required, is broadly consistent with the strategic policies in the currently adopted Local Plan and is also consistent with the emerging GNLP policies in relation to Buxton with Lamas Parish. It focuses developments towards Buxton Village and sites allocated for development as part of the development plan, and restricts development that is outside these areas. The supporting text of the policy recognises the previous site adjacent to the settlement boundaries allocated for housing development and references that the emerging GNLP brings a further site forward for development on land east of Aylsham Road for approximately 40 dwellings. This policy supports residential development outside settlement boundary on sites allocated for development as part of the development plan and supports other rural exceptional sites to meeting identified local needs for affordable housing. We consider the development strategy set out in the policy is sensitive to Buxton's defining characteristics as a village and also gives considerations to housing needs in this area. It is important that the NP continues to support residential development on sites outside the settlement boundary which have been allocated for development as part of the development plan.

We also recognise that a neighbourhood plan should provide a holistic sustainable approach to development, and therefore also

SUPPORT the following policies subject to **AMENDMENTS**.

Policy BUX 4 – Development and Design

This policy emphasises that a design-led approach should be taken for all proposals, and to support this the Parish prepared a Design Guidance and Codes, including the Design Codes specific to ten character areas. It requires that the design of proposals within each defined character area should be guided by the design codes identified by variations in the built form and architectural details, pattern of development, building line/plot arrangement etc. of that area.

We praise the approach the Parish has made in order to provide a design-led approach promoted by National Design Guide and the NPPF. We consider the Design Guidance and Codes set out detailed criteria and generally provide a balanced guidance for future development proposals to follow in order to protect the characteristics of the villages. However, this policy and the Design Guidance and Code do not make reference to the allocated housing sites. Currently, the two allocated housing sites are both located in the open countryside, hence fall within the character area: CA10 – Countryside. It will not be possible to design the two housing developments in compliance with characters set out under the Countryside area in the Design Codes. Therefore,

we consider this policy can and needs to be amended by adding design guidance specifically for the two allocated housing sites. This would be achieved by requiring that the design of housing allocations should carefully consider the characteristics of the adjacent settlement area such as CA 01 – Buxton: Aylsham Road for the allocation site – Land east of Aylsham Road. Furthermore, whilst we would agree that proposals should respect (rather than necessarily just copy) the prevailing character of buildings in the vicinity of a development site, the policy should also be amended to specifically reflect the wording of paragraph 130c) of the National Planning Policy Framework and recognise that developments should be “...sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...” (*our underlining*).

This policy also sets out a list of design principles to be compliant with. Criteria c) of the requirements for Building Form states that all back gardens in the parish should have a minimum depth of 10m and provide a minimum area of 50m². We consider this size requirement is reasonable within the context of the parish, as most houses within the parish have gardens of at least these dimensions and a rural setting should be maintained by providing generous gardens.

Policy BUX 6 – Protecting and Enhancing Landscape Character

We support the three landscape character areas defined in the NP, which are derived from the Broadland Landscape Character Assessment 2013. We consider Appendix 3

which provides detailed descriptions for landscape sensitivities and features sets out clear directions for future proposals to consider and incorporate into their design.

Paragraph 5.6.7 recognises the housing allocation at the edge of the Buxton village, and requires any future design of the housing scheme to protect the village setting by incorporating generous landscape buffers. We support this requirement and also consider this is a reasonable requirement to protect the character of the adjacent open countryside. ESCO Developments would look to incorporate this requirement into the design of the housing scheme at land to the east of Aylsham Road and deliver a scheme to respect the village setting and landscape characters of area - A2 : River Bure river valley.

Policy BUX 8 – Views to be Protected

We support the priority views and local iconic views set out in Map 11 and 12 and Appendix 1 which provides detailed descriptions of the views. This is compliant with paragraph 174 of the NPPF which requires development proposals to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. However, we consider this policy can be improved to be consistent with the spatial strategy set out in the NP to recognise the two housing allocations in Buxton village and make comments on how the design of housing allocation sites can protect the identified views located adjacent.

ESCO Developments respect that the allocated site on land east of Aylsham Road is located close to the designated iconic view S and would incorporate a design of the future housing development to respect the key view. Notwithstanding this, in order to be compliant with PPG para. 040 (Reference ID 41-040-20160211) which requires a policy in a neighbourhood plan to be clear and unambiguous and drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications, we believe additional contents can be added to provide guidance

on how the key views (priority views and iconic views) can be protected as a result of the housing schemes at the two strategic housing allocations in Buxton village.

Policy BUX 13 – Delivering Biodiversity Net Gain

The supporting text of the policy emphasises the Environment Act’s mandated minimum measurable Biodiversity Net Gain (BNG) for all developments. This requires that the biodiversity value of the development exceeds the pre-development biodiversity value of the site by a minimum of 10%. Policy 3 in the emerging GNLP also requires that all developments deliver a net gain in biodiversity of at least 10%. However, the policy does not mandate a 10% minimum biodiversity net gain, instead it only requires a measurable biodiversity net gain. Although this requirement does not directly conflict with the Environment Act’s minimum 10% BNG, this would potentially set up two sets of rules which essentially raise confusion for future developments. Therefore, we consider a

clarification should be added to the policy to reference the requirement for a gain in line with the Environment Act (or successor legislation).

We trust these comments are helpful as the Council looks to finalise its submission draft of the NP. Please do not hesitate to contact me in the first instance should you have any questions in relation to the above matters raised. ESCO Developments supports the draft Neighbourhood Plan subject to small improvements and are very happy to cooperate and ensure that Buxton can (continue to) be a vibrant, inclusive community. We would very much welcome an opportunity to meet with the Parish Council in due course to discuss any matters in relation to land east of Aylsham Road to help deliver a successful neighbour plan.

Yours sincerely

Andy Moffat BA(Hons) MPhil MRTPI

Planning Director

<p>NP Group</p>		<p>Add PARA 2.5.12 : Stakebridge cluster</p>
<p>Open Spaces Society 01</p>	<p>2.15.1 "Fakenham" should read "Dereham"</p> <p>2.16.5 The private road on the Heath leads to a footpath (Stratton Strawless FP 6) not to a bridleway. There is in fact only one Bridleway, recorded on the definitive map, in the parish and that is through Dudwick Park (BR 7).</p> <p>2.17.1 "Bure Valey Footpath" should read "Bure Valley footpath/cycleway".</p>	<p>Corrections accepted with thanks. All references to the footpath / cycleway along the railway track corrected to 'Bure Valley Path', following advice from BDC, throughout.</p>

[Open Spaces Society](#)
[02](#)

5.19.4, 6.8.2, and 6.8.3 Buxton with Lammas Footpath No. 8 is located on the opposite (south) side of the River Bure navigation. The re-alignment of a public highway, including a public path, is a serious matter, and (unless directly affected by development) is outside the scope of planning legislation/policies. Highways legislation would necessitate extensive consultation in any proposed move. Any shifting of the route of Buxton with Lammas Footpath No. 2, from its old, established route across the field, onto a farm vehicle track, may have adverse implications for the public when assessed against the relevant legislative criteria. Many long-established public paths, in Norfolk and elsewhere, run across arable fields, and the management of such situations (in terms of the needs both of occupiers of agricultural land, and of the public) is controlled by the provisions of the Rights of Way Act 1990.

This comment is noted. In this particular local context, the Plan contains the aspiration to re-align FP2 and also create an extension to it, thus adding to the footpath network and enhancing connectivity by foot. We believe this aspiration should remain. Should it ever progress, the objections of Open Spaces should be fully considered as part of the investigation and consultation.

<p>Open Spaces Society 03</p>	<p>page 82: Map 18 One of the "community identified potential footpaths" is in fact the connecting walkway linking Levishaw Close and Church Close. This is a Norfolk County Council maintained road. Also, Footpaths No. 9, 12, 13, and 14 do not appear to be correctly shown on the map.</p>	<p>Map 18 updated to identify NCC maintained walkway, and add note that FP12, FP13 and FP14 are shown but not labelled. Definitive PROW map referenced.</p>
<p>Open Spaces Society 04</p>	<p>Appendix 1. Priority view 3 Regarding the reference to Iron Bridge. We understand that locally this is always referred to as Pile Bridge. This is used on pages 102 and 105.</p> <p>page 109 "Other notes". Whilst Hautbois Hall can also be appreciated from the main entrance, undoubtedly the best publicly available views of this important building are from Footpath No. 1, which passes the hall on the way to/from the level crossing.</p>	<p>"Iron Bridge" amended to "Pile Bridge". Reference to FP1 inserted. Reference to stile in View Y removed.</p>

	<p>page 114 "View Y". It is important to point out that there are no longer stiles along FP4. These were all replaced by gates some time ago, thus making the path available to a wider section of the community.</p>	
<p>Open Spaces Society 05</p>	<p>There should generally be a presumption in favour of legally registering green spaces and open spaces as village greens, which may be done on a voluntary basis, by the owner of the soil, under Section 15(8) of the Commons Act 2006.</p> <p>Legal registration of village greens provides the land with lasting legal protection against encroachment or damage - with legal means for the public to enforce, if necessary - and the inhabitants of a defined locality enjoy a legally registered right to indulge in lawful recreation on the land.</p> <p>Village greens can be any size, large or small, and consist of a wide variety of land types.</p>	<p>Noted with thanks</p>

Wherever the provision of new green/open spaces (whether large or small) is being proposed, by developers as part of a development scheme, then the local planning authority should be encouraged to make the registration of the relevant areas as village green, under s.15(8) of the 2006 act, a condition of any grant of planning permission.

For further information on the voluntary registering of village greens, see:

<https://www.gov.uk/government/publications/guidance-on-voluntary-registration-of-land-as-a-town-or-village-green> and <https://www.oss.org.uk/what-do-we-fight-for/village-greens-voluntary-registrationdedication-of-land-as-a-town-or-village-green-of-land-as-a-town-or-village-green/>

[Open](#)
[Spaces](#)
[Society](#)
[06](#)

As has been pointed out, of the 15 public rights of way, currently recorded on the Norfolk County Council definitive map of public rights of way, only one of these is a bridleway. There would appear, then, to be under-provision for non-motorised travellers which are not pedestrians.

Whilst it may be good that, as stated in paragraph 6.8.4, further opportunities exist as to "negotiate with landowners and create additions to the footpath network", the needs of other categories of non-motorised traveller should not be neglected, not least, horse-riders and cyclists.

Whilst all categories of public right-of-way are, of course, fully open to pedestrians, bridleways carry additional rights for the public to ride or lead a horse, as well as a statutory right for pedal cycles (provided that cyclists give way to pedestrian or equestrian users - Countryside Act 1968, Section 30). Restricted Byways carry rights for pedestrians, equestrians, and non-motorised vehicles too, such as pedal cyclists and horse-drawn carriage.

6.8.4 amended to read "...create additions to the footpath, bridleway and rights of way networks."
Policy BUX20 addresses connectivity for non-motorised users in new development proposals.

Opportunities should be sought to secure routes to carry additional rights, too, wherever possible and appropriate. The creation of new public right(s) of way can be made a condition of a grant of planning permission, where appropriate, and such new routes need not necessarily be confined to footpaths, as opposed to bridleways or byways.

Also, creating public paths which are free of structures, such as stiles or gates, wherever possible - or removing structures (especially stiles) from existing paths, wherever possible - is valuable in making such routes available to those with limitations to their mobility, i.e., to a wider section of the community.

Adequate widths are important, too, and the widths recommended in section 8.3.1 of the statutory Rights of Way Improvement Plan should normally be regarded as the minimum acceptable. (The Norfolk Rights of Way Improvement Plan document may be viewed here: <https://www.norfolk.gov.uk/-/media/norfolk/downloads/out-and-about/public-rights-of-way/norfolk-access-improvement-plan.pdf>)

The Parish Council should be ever mindful of their own statutory powers to create new highways by agreement, under section 30 of the Highways Act 1980.

[Open](#)
[Spaces](#)
[Society](#)
[FULL](#)

2.15.1 "Fakenham" should read "Dereham"

2.16.5 The private road on the Heath leads to a footpath (Stratton Strawless FP 6) not to a bridleway. There is in fact only one Bridleway, recorded on the definitive map, in the parish and that is through Dudwick Park (BR 7).

2.17.1 "Bure Valey Footpath" should read "Bure Valley footpath/cycleway".

5.19.4, 6.8.2, and 6.8.3 Buxton with Lammas Footpath No. 8 is located on the opposite (south) side of the River Bure navigation. The re-alignment of a public highway, including a public path, is a serious matter, and (unless directly affected by development) is outside the scope of planning legislation/policies. Highways legislation would necessitate extensive consultation in any proposed move. Any shifting of the route of Buxton with Lammas Footpath No. 2, from its old, established route across the field, onto a farm vehicle track, may have adverse implications for the public when assessed against the relevant legislative criteria. Many long-established public paths, in Norfolk and elsewhere, run across arable fields, and the management of such situations (in terms of the needs both of occupiers of agricultural land, and of the public) is controlled by the provisions of the Rights of Way Act 1990.

page 82: Map 18 One of the "community identified potential footpaths" is in fact the connecting walkway linking Levishaw Close and Church Close. This is a Norfolk County

Council maintained road. Also, Footpaths No. 9, 12, 13, and 14 do not appear to be correctly shown on the map.

Appendix 1. Priority view 3 Regarding the reference to Iron Bridge. We understand that locally this is always referred to as Pile Bridge. This is used on pages 102 and 105.

page 109 "Other notes". Whilst Hautbois Hall can also be appreciated from the main entrance, undoubtedly the best publicly available views of this important building are from Footpath No. 1, which passes the hall on the way to/from the level crossing.

page 114 "View Y". It is important to point out that there are no longer stiles along FP4. These were all replaced by gates some time ago, thus making the path available to a wider section of the community.

There should generally be a presumption in favour of legally registering green spaces and open spaces as village greens, which may be done on a voluntary basis, by the owner of the soil, under Section 15(8) of the Commons Act 2006.

Legal registration of village greens provides the land with lasting legal protection against encroachment or damage - with legal means for the public to enforce, if necessary - and the inhabitants of a defined locality enjoy a legally registered right to indulge in lawful recreation on the land.

Village greens can be any size, large or small, and consist of a wide variety of land types.

Wherever the provision of new green/open spaces (whether large or small) is being proposed, by developers as part of a development scheme, then the local planning authority should be encouraged to make the registration of the relevant areas as village green, under s.15(8) of the 2006 act, a condition of any grant of planning permission.

For further information on the voluntary registering of village greens, see:

<https://www.gov.uk/government/publications/guidance-on-voluntary-registration-of-land-as-a-town-or-village-green> and <https://www.oss.org.uk/what-do-we-fight-for/village-greens-voluntary-registrationdedication-of-land-as-a-town-or-village-green-of-land-as-a-town-or-village-green/>

As has been pointed out, of the 15 public rights of way, currently recorded on the Norfolk County Council definitive map of public rights of way, only one of these is a bridleway. There would appear, then, to be under-provision for non-motorised travellers which are not pedestrians.

Whilst it may be good that, as stated in paragrapg 6.8.4, further opportunities exist as to "negotiate with landowners and create additions to the footpath network", the needs of

other categories of non-motorised traveller should not be neglected, not least, horse-riders and cyclists.

Whilst all categories of public right-of-way are, of course, fully open to pedestrians, bridleways carry additional rights for the public to ride or lead a horse, as well as a statutory right for pedal cycles (provided that cyclists give way to pedestrian or equestrian users - Countryside Act 1968, Section 30). Restricted Byways carry rights for pedestrians, equestrians, and non-motorised vehicles too, such as pedal cyclists and horse-drawn carriage.

Opportunities should be sought to secure routes to carry additional rights, too, wherever possible and appropriate. The creation of new public right(s) of way can be made a condition of a grant of planning permission, where appropriate, and such new routes need not necessarily be confined to footpaths, as opposed to bridleways or byways.

Also, creating public paths which are free of structures, such as stiles or gates, wherever possible - or removing structures (especially stiles) from existing paths, wherever possible - is valuable in making such routes available to those with limitations to their mobility, i.e., to a wider section of the community.

Adequate widths are important, too, and the widths recommended in section 8.3.1 of the statutory Rights of Way Improvement Plan should normally be regarded as the minimum acceptable. (The Norfolk Rights of Way Improvement Plan document may be viewed [here](#):

<https://www.norfolk.gov.uk/-/media/norfolk/downloads/out-and-about/public-rights-of-way/norfolk-access-improvement-plan.pdf>)

The Parish Council should be ever mindful of their own statutory powers to create new highways by agreement, under section 30 of the Highways Act 1980.

R01	Dear Sirs, My wife xxx and I recently moved to Buxton from Aylsham.and purchased xxx on xxx. We are trying to symphically renovate the property and retain the historical nature. We would welcome a conversation, how best to keep the historical integrity of the farm house and the barn on our property. subject to any future plans of any development.we may want to discuss.	This specific issue is best dealt with through pre application, application process
---------------------	---	---

<p>R02</p>	<p>2.15.1 Fakenham should read Dereham</p> <p>2.16.5 The private road through the Heath leads to a footpath (Stratton Strawless FP 6) not to a bridleway. There is in fact only one Bridleway in the parish and that is through Dudwick Park (BR 7)</p> <p>2.17.1 Should read Bure Valley footpath/cycleway.</p> <p>page 81 5.9.4 This should read extending to join the Bure Valley railway path.(remove reference to FP8 which is the other side of the railway and Bure navigation. FP8 runs from Mayton to join FP4 at Pile Bridge. There is another reference on page 97 6.8.2</p> <p>page 82 Map 18 One of the community identified potential footpaths is in fact the connecting walkway linking Levishaw Close and Church Close. This is a Norfolk County Council maintained road</p> <p>FP9 appears to be a link from Back Lane to Back Lane. It finishes at Bulwer Road. Across the road and entering The Dell it is FP12 to Back Lane and at the bend of the footpath shown on the map there are 2 very short paths from FP12, both entering</p>	<p>Corrections accepted with thanks. 'Bure Valley footpath' changed to 'Bure Valley Path' throughout. Map 18 updated to identify NCC maintained walkway, and add note that FP12, FP13 and FP14 are shown but not labelled. Definitive PROW map to be referenced and included with other evidence.</p>
----------------------------	---	---

Woodland Walk entrance to The Dell. These are FP13 and FP14. Is it even possible to show this on the map ?

page 102 Appendix 1. Priority view 3 The reference to Iron Bridge. Locally this is always referred to as Pile Bridge. This is used again on page 105.

page 104 In the description Wier is used instead of Weir

page 105 Description. Upper case required for Bure.

Page 109 Other notes. Hautbois Hall can also be appreciated from the main entrance - perhaps add "which is also the start of Footpath 1 that passes the Hall to the level crossing."

page 114 View Y. There are no stiles along FP4. These were all replaced by gates some time ago.

page 130 Photo 5 The Millennial Tree (Oak) is in fact a Jubilee Tree, planted in 2012, to mark the 60th anniversary of Queen Elizabeth II. The bench had been there for many years before and not part of the Jubilee (Where did this information come from)

[R02](#)

Stratton Road has a 60 mile limit as does Back Lane for most of it's length. The 30 mph sign in Norwich Road ought be removed and erect in Stratton Road beyond the houses.

Erect 30 mph limits on Norwich Road south of the Stratton/Back Lane Junction. This will mean that all of Back Lane will be covered by 30 mph and go some way to achieve a Quiet Lane.

Why isn't there a 30 mph limit past the houses on Stratton Road as there is in Stratton Strawless village. It isn't as if there is a pavement. 60 mph is far too fast

Noted with thanks. Comments to be passed to parish council as this is an issue already addressed in our list of community projects

[R03](#)

Dear Tim,

Hope this email finds you well.

I am writing to you to clarify some points with the Steering Group re the above and would very much appreciate your responses to the following points. They relate to the given numbered paragraphs in the Plan.

2.5.9. In 1982 the gravestones were removed to one side of the burial ground and the overgrown vegetation was cleared (ie six foot high brambles and weeds) No levelling took place and NO remains were ever removed from the burial site and ALL remain "IN SITU" and UNDISTURBED. The burial ground needs protecting.

We feel this is really important to get the historical facts correct re burials information for future generations. (final sentence redacted to remove personal information)

2.5.10. BURE VALLEY BUSINESS CENTER. Environmental. The site has no drainage system in place with two single toilets drained to an ancient septic tank beneath unit 4

We shall pass these comments on to the parish council.

and the ONLY SURFACE DRAIN is outside Unit 9 and is piped under the road directly onto the Water Meadows opposite.

With B2 General Industry operating there along with other Class businesses, there is NO provision for the removal of TRADE EFFLUENT OTHER THAN THIS i.e. Pressure washing chassis's, pouring substances into drain, spray painting, chemicals, oil ect, ect.

The run off from this entire site goes straight onto the Water Meadows.

Since our last meeting another larger B2 Business has been allowed on site incorporating Units 1, 2 and 8 (the three large units at the top of the yard) this is a motor engineering/ sales company both Cars and Commercial Vehicles.

There is a Historic Building amongst the above site which needs preserving, are the Steering group aware of existence.

There are a couple of more points to raise next weekend and I look forward to seeing you then.

Well done on all your hard work!

[R04](#)

A fantastic document, thanks! Re memorial trees - a very important one not mentioned is "Don's Oak" located in the school grounds, in an outdoor learning area that backs onto the far end of our garden. Don Mackenzie was a great village character, teacher and then head of the school. He retired early 1990s(?) passed away some years later and lived in Lammas.

In speaking over the fence to the odd teacher, there seems to be no knowledge of him or the now substantial tree and apparently no plaque. Happy to contact the current head teacher if you think best, but thought it worth recording with yourselves. Thanks again for all your efforts.

"Don's Oak" to be added to Appendix 4

[R05](#)

Brook Street needs a robust significant speed reduction programme. HIGH VISIBLE .To vehicle users.

From junction Prish Road Norwich Road Brook street White Village entrance gates..."You are entering our village.30mph at very most preferable 20 mph

Written on Road large circles as well as flashing speed signs.

No pedestrian footpath ,lots of farm traffic bus cars snd lorries all exceed speed limit

Dangerous to exit one's own drive

Let alone negotiate walking to Back Lane,village store or access footpaths.

Meadow next to the Dell off Brook street has significant water course

Ditch leads to Brook and water ways which could be polluted .

This area is a diverse green habitat

High water table ,floods regularly

Totally unsuitable for future housing development as natural flood plain.

All comments noted with thanks. Traffic issues to be forwarded to parish council.

Regularly floods significantly across meadow into adjoining meadow towards sandy Lane Back lane.

No development of these two meadows as would affect water course,pollution flood risk to Brook street.

Traffic issues on Brokk Street need to be addressed.No development should increase traffic numbers onto Brook street Back lane Sandy Lane Norwich Road or Parish Road Lion Road

There have been traffic accidents on Brook street and Lions road.

Need safe pedestrian access from end of Brook Street Junction to Back lane.

No development of any size in this vicinity.

Protect Back lane Sandy Lane

Quiet lane status

Protect Oaks in this area and diverse hedgerows for natural species habitat.

No light pollution protect dark skies

Sustainable environmental protecting conditions for any future build in the parish area only.

Buxton should have an area for village green space and allotments slow down and reduce traffic accidents.

Community green space designated

Could highways not hack hedgerows on Brook street

But to have hedges cut more environmentally friendly for habitat

Protect historic and historically valued properties in the village.

Any planning to be in one area only with close proximity to amenities and school .

Such as land off Stacey Road.

Footpaths to school can easily be incorporated.

But Buxton protected from large scale development.

Brook Street traffic is main priority to

<p>R06</p>	<p>The water meadows between The Street and the River Bure (west end of The Street) must be protected against development as these are an integral part of the flood plain, and have in years past acted as just that, as do the meadows on the other side of the River.</p>	<p>This is addressed in policy BUX15. A new watermeadows map has been added to improve clarity and assist with implementation of the policy.</p>
<p>R07</p>	<p>Buxton Mill</p> <p>The road around Buxton mill needs speed humps at leave 100 and 50 metres to slow down traffic both ways, also 20 mph. Signs (30mph signs at the moment are too fast) that would help people walking back and forth "one Accident" is one too many.</p> <p>With reference to the plot of land opposite Buxton Mill (Lammas sign green)</p> <p>People who visit family and friends that live at the mill when the car park is full, have no where to park, so use the small piece of land opposite the mill around the Lammas sign.</p> <p>Small planters at the front of this plot of land opposite Buxton Mill would look nice, if the planters are put on the green space opposite Buxton mill , where will the spill over of cars go who visit family at buxton mill (answers on a postage stamp please). Page 135 CA5 SPO2 On plot parking is recommended, Avoid on-street parking.</p>	<p>Noted with thanks. Comments to be forwarded to Parish Council and Buxton Mill residents' association.</p>

<p>R08</p>	<p>Transport: #80 bus on a friday goes to Dereham, and not Fakenham as stated</p> <p>Spelling: Beech Trees not Beach Trees</p> <p>Spelling: Weir Cottage not Wier Cottage</p> <p>Apostrophy is incorrect in the years</p> <p>Dates of when the estates were built in Buxton is wrong. Mead close was late 60s and before Church close which was 68 to early 70s. Levishaw close was built 70s and finished early 80s</p> <p>Its really good, I like the dark skys, views and water meadow protection</p>	<p>Corrections accepted with thanks.</p>
<p>R09</p>	<p>The essence of Buxton with Lamas is as a charming, riverside village, ecapsulating the best of Norfolk village life, with a strong community ethos. I believe that essence should be fully protected in the Neighbourhood Plan. I think a most important issue in that context is what happens to the Bure Valley Business Centre. Its strategic position in the centre of Lamas village, alongside the historic Anna Sewell site and overlooking the beautiful water meadows, reflect its strategic importance to the ambiance of the village. The site's use needs to protect that characteristic.</p>	<p>Agree with comments, the policy and revisions achieve this.</p>
<p>R10</p>	<p>I recently received a letter saying that The Coach House, Mill Street, Buxton (which I own) has been identified as a proposed Non-designated Heritage Asset -- but the printed</p>	<p>The list of NDHA has been revised.</p>

	pre-submission version of the Plan does not include The Coach House on page 62 of the document (Policy BUX11).	
R11	<p>Road Safety on Lion Road, Buxton and housing developement.</p> <p>There have been 11 road traffic accidents and 13 casualties along Lion Road between 2013 and 2021 (source CrashMap.co.uk , using police data).</p> <p>During the same time there have been only 14 further accidents in all of Buxton, Lamas and Badersfield. None along Crown Road.</p> <p>A further housing development leading onto Lion Road will increase traffic and assosiated accident risks.</p> <p>Without dramatic improvement in road safety measures (which I understand is beyond the scope of this plan), there will surely be even more accidents and casualties.</p> <p>Please lets place lives first.</p>	Noted with thanks and comments have been passed to the parish council (re Bux 22)
R12	I support all the policies proposed	Noted with thanks.
R13.01	Ref. 2.5.9. Page 18. Contrary to the NP the remains were NEVER removed to other sites and still remain "IN SITU" This must must be historically correct in respect of the families of those interred and for future generations.	Thank you. This correction has been made.

R13 02	Ref. 3.5.2 Page 29. No mention of increased traffic to and from Bure Valley Business Centre.	Inserted 'and Bure Valley Business Centre'
R13 03	Ref. 5.14.1 page 69. No mention of run-off from INDUSTRY e.g. Bure Valley Business Centre onto Water Meadows. RISK TO RIVER AND WETLANDS.	Our policy applies to all areas of hard standing and this includes Bure Valley Business Centre. Also see Policy BUX 23
R13 04	5.23.1 Page 87. There should be no mention of Canoe Hire as there are no legal businesses carrying out this activity. Canoe Man is still in contention with no planning consent and strong opposition of local residents. i.e. 30 letters of complaint on BDC planning portal.	Deleted '(eg. canoe hire, holiday cottages)'
R13 05	Ref 5.24.3 page 89. It should be made clear that this has happened WITHOUT PLANNING CONSENT. ALSO ALL UNITS, EXCEPT FOR ONE, ARE NOW B2 GENERAL INDUSTRY. Should also include POLLUTION OF WATER MEADOWS THROUGH ILLEGAL DISPOSAL OF TRADE EFFLUENT. NO LEGAL DRAINAGE IN PLACE.	Amended para 5.24.3: "...associated with general industry (B2) "

<p>R13 FULL</p>	<p>Ref. 2.5.9. Page 18. Contrary to the NP the remains were NEVER removed to other sites and still remain “IN SITU” This must must be historically correct in respect of the families of those interred and for future generations.</p> <p>Ref. 3.5.2 Page 29. No mention of increased traffic to and from Bure Valley Business Centre.</p> <p>Ref. 5.14.1 page 69. No mention of run-off from INDUSTRY e.g. Bure Valley Business Centre onto Water Meadows. RISK TO RIVER AND WETLANDS.</p> <p>5.23.1 Page 87. There should be no mention of Canoe Hire as there are no legal businesses carrying out this activity. Canoe Man is still in contention with no planning consent and strong opposition of local residents. i.e. 30 letters of complaint on BDC planning portal.</p> <p>Ref 5.24.3 page 89. It should be made clear that this has happened WITHOUT PLANNING CONSENT. ALSO ALL UNITS, EXCEPT FOR ONE, ARE NOW B2</p>	<p>p18 - Corrected</p> <p>p29 - inserted ‘and Bure Valley Business Centre’</p> <p>p69 - ‘...run-off into waterways from the Bure Valley Business Centre, parish roads, and other areas of hard-standing’</p> <p>p87 - deleted ‘(eg. canoe hire, holiday cottages)’</p> <p>Amended para 5.24.3: “...associated with general industry</p> <p>(B2)”</p> <p>Thank you for these comments.</p>
---	---	--

	<p>GENERAL INDUSTRY. Should also include POLLUTION OF WATER MEADOWS THROUGH ILLEGAL DISPOSAL OF TRADE EFFLUENT. NO LEGAL DRAINAGE IN PLACE.</p>	
--	---	--

[R14 01](#)

These are just some general comments about inaccuracies within the report:

Section 2

2.9.1 'Buxton (including the Heath) benefits from fibre broadband. Mobile phone signals can be patchy.' - No it doesn't, we have some of the slowest broadband speed in the country

2.16.5 'The private road on the Heath leads to a bridleway' - actually I believe that the private road is also a designated footpath Buxton with Lammas FP15, which leads to another footpath Stratton Strawless FP6 (source <http://maps.norfolk.gov.uk/highways/>)

Generally, the document would benefit from proof reading - particularly noticeable is the inconsistent use of capital letters throughout the document. I realise that these are not vital issues, but small errors and inaccuracies detract from the credibility of the document, which is really important for the future of our village.

2.9.1. has been amended to “**Connectivity in Buxton (including The Heath) is variable, with some parts benefiting from fibre broadband but others experiencing slower than average broadband speeds. Mobile phone signals can be patchy.**” Other corrections accepted with thanks.

<p>R14 02</p>	<p>In the section 'Locally important views' :</p> <p>View M: Buxton Village centre.</p> <p>'From this view you get the image of the Buxton mill in the foreground or the Polo as known locally.' Should this refer to the millstone rather than the Mill?</p> <p>View T: Gallows Hill Sandy Lane</p> <p>'As the round bends round and down into the cross roads at the bottom of the small incline to the left is gallow [sic] hill...'. I think the first instance of the word 'round' should be 'road' .</p> <p>View X: The Heath, Buxton</p> <p>'From the corner at Buxton Heath, down towards Buxton Brook St the view is across the fields below.' Not 'Buxton Heath' - 'The Heath, Buxton'.</p>	
<p>R14 03</p>	<p>Generally, the document would benefit from proof reading - particularly noticeable is the inconsistent use of capital letters throughout the document. I realise that these are not</p>	<p>Agreed. A more thorough proof reading has been undertaken</p>

	<p>vital issues, but small errors and inaccuracies detract from the credibility of the document, which is really important for the future of our village.</p>	
--	---	--

[R14](#)
[FULL](#)

These are just some general comments about inaccuracies within the report:

Section 2

2.9.1 'Buxton (including the Heath) benefits from fibre broadband. Mobile phone signals can be patchy.' - No it doesn't, we have some of the slowest broadband speed in the country

2.16.5 'The private road on the Heath leads to a bridleway' - actually I believe that the private road is also a designated footpath Buxton with Lammas FP15, which leads to another footpath Stratton Strawless FP6 (source <http://maps.norfolk.gov.uk/highways/>)

In the section 'Locally important views' :

View M: Buxton Village centre.

'From this view you get the image of the Buxton mill in the foreground or the Polo as known locally.' Should this refer to the millstone rather than the Mill?

2.9.1. amended to “**Connectivity in Buxton (including The Heath) is variable, with some parts benefiting from fibre broadband but others experiencing slower than average broadband speeds.** Mobile phone signals can be patchy.” Other corrections accepted with thanks.

View T: Gallows Hill Sandy Lane

'As the round bends round and down into the cross roads at the bottom of the small incline to the left is gallow [sic] hill...'. I think the first instance of the word 'round' should be 'road' .

View X: The Heath, Buxton

'From the corner at Buxton Heath, down towards Buxton Brook St the view is across the fields below.' Not 'Buxton Heath' - 'The Heath, Buxton'.

Generally, the document would benefit from proof reading - particularly noticeable is the inconsistent use of capital letters throughout the document. I realise that these are not vital issues, but small errors and inaccuracies detract from the credibility of the document, which is really important for the future of our village.

[R15](#)

This is a comprehensive, well constructed plan.

However, given its significance (1.1.1) I feel it should more accurately reflect local documented concerns regarding "existing businesses" in Lamas ie canoe hire and B2 at Bure Valley Business Centre (which have circumvented planning permission and regulations) rather than respecting the status quo (5.1.6,CA6).

The "canoe hire" business made a planning application for storage of canoes only in May 22 and this is still awaiting consideration by Broadland Council Planning Committee due to objections regarding the unsuitability of the location for storage (6.5.4, 3.6.1, 3.6.2, 2.17.2)) and continued accessing of canoes from this site by customers although there are no facilities for them. With regard to local employment bookings are made via the website and the location is generally unmanned.

Although my understanding is that BVBC originally had B1 and B8 planning permission the site is now almost exclusively used for B2 businesses due to catastrophic failure to monitor usage. As acknowledged (5.2.24) most buildings are in poor repair and it is doubtful that the infrastructure of the Centre is adequate to manage the B2 trade effluent generated by the current businesses appropriately. I have witnessed water contaminated with oil running out of the drain on the site across The Street to the water meadows opposite. The siting of the B2 businesses at the BVBC appear incompatible with much of the Neighbourhood Plan. Aside from the nuisance issues to residents, location next to a heritage property (5.11.4) there are serious environmental concerns that do not appear to be being addressed by the relevant authorities which relate to the very core of this

References to canoe hire removed throughout.

BUX 24: Policy has been strengthened around environmental issues (see new policy wording).

The NP cannot remove existing classes of use - this is an issue recognised by BDC. References to Friends Meeting House corrected throughout.

plan (1.1.5). These are too numerous to reference individually but include 6.11.1; Bux 24,3e; 5.14.1;5.14.3 and 3.10.4.

NB Friends Meeting House (listed building) has also been referred to as Friendly House and Friendship House within this Neighbourhood Plan.

<p>R16 01</p>	<p>2.5.11 mentions the Land Registry indicates this land has been parcelled into 28 spaces for dwellings. This land has previously been categorised of special scientific interest due to the wildlife (Bittern) and a water meadow. It is regularly subject to seasonal flooding, so certainly not suitable for residential development.</p> <p>Photos of flooding available.</p> <p>2.8.2 Mentions a canoe hire business. A canoe hire business is still subject to a planning application which includes numerous objections and issues in respect of 'Health & Safety', local facilities, infrastructure to support the inevitable influx of visitors and actual benefit to the community.</p> <p>Congratulations on a well constructed plan and I am appreciative of the volume of work inherent with the process.</p>	<p>The NP recognises the importance of the water meadows for both flood management and nature conservation reasons. The Lammas water meadows is not however a designated SSSI. 2.5.11 has been amended to: "the water meadows, which are frequently flooded". References to canoe hire removed throughout.</p>
<p>R16 02</p>	<p>BUX 8 Protected views Footpath 4 view towards Buxton Mill, mentions the island to the right with trees and canoes being part of the protected view. I am not sure how canoes can be part of a protected view especially as the island is subject to another planning application to store canoes. The impact on nature should be considered of paramount importance not the view of canoes.</p>	<p>Reference to canoes removed.</p>

R16 03	BUX 23 5.23.1 again mentions canoe hire. Please see my previous comments.	Reference to canoe hire removed.
R16 04	BUX 24 Bure Valley Business Centre. Any change of use to the BVBC should be commended as it's present and potential expansion of tenants from B1 to B2 category is without planning consent and not conducive to a village environment with increased volume of HGV's, noise and pollution to the water meadows opposite from a surface water drainage system not designed to process engineering/vehicular waste.	Noted with thanks

[R16](#)

[FULL](#)

2.5.11 mentions the Land Registry indicates this land has been parcelled into 28 spaces for dwellings. This land has previously been categorised of special scientific interest due to the wildlife (Bittern) and a water meadow. It is regularly subject to seasonal flooding, so certainly not suitable for residential development.

Photos of flooding available.

2.8.2 Mentions a canoe hire business. A canoe hire business is still subject to a planning application which includes numerous objections and issues in respect of 'Health & Safety', local facilities, infrastructure to support the inevitable influx of visitors and actual benefit to the community.

BUX 8 Protected views Footpath 4 view towards Buxton Mill, mentions the island to the right with trees and canoes being part of the protected view. I am not sure how canoes can be part of a protected view especially as the island is subject to another planning application to store canoes. The impact on nature should be considered of paramount importance not the view of canoes.

BUX 23 5.23.1 again mentions canoe hire. Please see my previous comments.

BBUX 24 Bure Valley Business Centre. Any change of use to the BVBC should be commended as it's present and potential expansion of tenants from B1 to B2 category is without planning consent and not conducive to a village environment with increased volume of HGV's, noise and pollution to the water meadows opposite from a surface water drainage system not designed to process engineering/vehicular waste.

Congratulations on a well constructed plan and I am appreciative of the volume of work inherent with the process.

[R17 01](#)

It is great to see a Neighbourhood Plan that really seems to capture the key essence of the Parish and sets out its positive qualities and seeks to protect and enhance them so well. The effort of all involved is much appreciated.

Generally what I love about our Parish and the reason I live in Buxton is to do with its rural village feel, green spaces, access to nature and the presence of wildlife. I also appreciate its good connectivity to the rest of Norfolk including the city of Norwich. I was thus delighted to see both the rural, green feel of the Parish and its habitats and biodiversity recognized and supported in the NP. With small pieces of biodiversity being lost regularly it was good to see importance placed on both its safeguarding through BUX12 and net gain through BUX13. It was also good to see key biodiversity assets like the Bure Valley Path, The Dell and key hedgerows and trees noted so that these can be specifically supported. With the importance of waterways in our Parish I also found BUX15 and the many mentions of protecting our waterways in the NP very encouraging. I also fully support BUX10 – recognizing and protecting our dark skies.

It is fantastic to see nature, wildlife and environmental impact included in discussion and planning policy. That so many things such as provision of trees, garden spaces, wildlife corridors and avoiding impermeable surfaces and water run off have been thought of is really heartening.

Noted with thanks.

R17 02	<p>Appendix 4 Queries:</p> <p>The Bure Valley Path is mentioned in two sections E & F. This doesn't seem to cover the entire length of the path in the Parish unless I am just misreading. I feel the whole length of the path in the Parish could be considered either tree or shrub/hedgerow lined.</p> <p>Old or Large Trees Section – It is wonderful to see so many trees specifically noted and I'm sure there are more that I'd like to add! Trees 33-35 however are listed as Field</p>	<p>Appendix 4 reviewed and amended as a result of this and other comments.</p>

	<p>Maple in error. 33 is a Tree of Heaven (a beautiful feature but also often considered an invasive species). From memory I believe 34 & 35 are a Sycamore and Norway Maple but this should be double checked.</p>	
<p>R17 03</p>	<p>In point 2 of the summary of BUX13 on page 68 I think it would be good to state that the excellent measures stipulated be targeted at increasing biodiversity generally and particularly declining and protected species. I found the current wording of locally protected species a little ambiguous as it suggests a list of species only protected in our locality. Surveys to establish what species are present and to be protected could be encouraged or required.</p> <p>I wonder if there is room within the NP to include net biodiversity gain into the Local Green Spaces section (for instance leaving a margin uncut around edges or installing bird/bat boxes or even a swift tower). I would also love to see the use of pesticides in public spaces and on road verges addressed as this has a negative effect on biodiversity</p>	<p>Thank you for this comment. As a result we have changed Policy BUX 13, Clause 2. "All development proposals.....to be targeted at increasing local biodiversity, ie locally valued species, declining and protected species and vulnerable and threatened species. For current species status, refer to Norfolk Biodiversity Partnership Habitat and Species Action Plans https://www.norfolkbiodiversity.org and Natural England https://publications.naturalengland.org.uk/category/10002" Regarding surveys, yes these are required at planning application stage.</p>

	<p>and could impact the health of domestic animals and people. It also looks awful when the plants die off.</p>	
<p>R17 04</p>	<p>In point 3.10.4 I felt the wording could be changed to better reflect the type of tourism being referred to. It seems a shame to specifically mention just wild swimmers as (youths aside at the Mill Pond!) I'd say wild swimmers are on the whole very responsible in their use of the countryside and also in the minority compared to folk having a picnic/dog walkers/kayakers etc who would arguably have more environmental impact.</p>	<p>Reference to wild swimmers deleted.</p>
<p>R17 05</p>	<p>BUX24: I was pleased to see scope for sensitive development and encouragement of businesses at the Bure Valley Business Centre. I do find that there is a difficulty with wanting to encourage village appropriate business that ultimately could lead to less travel via more local amenities for local residents vs not wanting traffic, particularly HGVS (section BUX22) in the village. HGVS are generally used in the supply chain for shops/cafes and I think care needs to be taken that policies like point 3 in BUX22 do not</p>	<p>It is not the intention to hinder the operation of small businesses but to ensure the implications for HGV movements is considered when/if development proposals comes forward that will then have adverse effectson road safety or residential amenity.</p>

	<p>stop small businesses that would otherwise have a net benefit to the area from establishing and thriving.</p>	
R17 06	<p>I am concerned that the settlement limits and development policies don't allow for those that would like to live on the land in more off grid, private settings. There is surely scope to allow for this if it can be shown to have limited impact on the environment, show a net gain for biodiversity and could even be used to demonstrate good practice for ecobuilding and design. In the current climate with concerns about food supply chains, climate change and a disconnect with nature it would be good to see low impact, smallholding type living spaces being encouraged, built and showcased and these would fit better in the area outside the settlement area. Perhaps the OPD system in Wales could be drawn on?</p>	<p>The creation of new dwellings in the open countryside is generally not supported due to implications for unsustainable travel patterns and access to shops and services. Unlike parts of rural Wales, the parish is not regarded as lending itself to sustainable living via newly created small holding properties. National, local and NP policy does allow for exceptional circumstances as listed in applicable policies. Exceptions listed under 3c), now also including reference to Para 80 NPPF, allow for these scenarios.</p>

R17 07	<p>I appreciated the statement in 5.18.1 that the purpose of the NP is 'not to give out instructions as to how people should lead their lives'. With this in mind there are a couple of points in BUX18 that I do not support in the context of gaining planning permission for private dwellings (particularly individual dwellings) – the need to provide charging points for electric vehicles and the requirement for the infrastructure for super fast broadband. I would consider both of these lifestyle choices. Electric vehicles are not without serious environmental impact and charging points can be easily added post build if required and superfast broadband is not the only way to gain good access to the internet so I don't feel either of these should be a cause to not gain planning permission. Also the policy relating to concentrations of homes being within walking distance to shops and services I find a little irrelevant to our Parish as whilst our village shop is useful it does not supply a broad enough range to meet everyone's complete needs so, particularly with the many proposals and appetite for the development of greener transport, I don't feel new developments should be tied to walking distance of our village services.</p>	<p>This policy has been removed since much of it already exists in legislation; the last clause has been subsumed into Policy BUX 1</p>
R17 08	<p>BUX2 – Feoffee Cottages: It was good to see that this section was dealt with sensitively with reference to the history and ethos of the Trust and the intention to carry this forward. I was also pleased to see the retention of green space in any future development plans</p>	<p>Thank you for these comments, which are noted</p>

	<p>and that there is scope for appropriate development of the cottages despite their status in the plan as a non-listed heritage asset.</p>	
--	---	--

[R17](#)

[FULL](#)

It is great to see a Neighbourhood Plan that really seems to capture the key essence of the Parish and sets out its positive qualities and seeks to protect and enhance them so well. The effort of all involved is much appreciated.

Generally what I love about our Parish and the reason I live in Buxton is to do with its rural village feel, green spaces, access to nature and the presence of wildlife. I also appreciate its good connectivity to the rest of Norfolk including the city of Norwich. I was thus delighted to see both the rural, green feel of the Parish and its habitats and biodiversity recognized and supported in the NP. With small pieces of biodiversity being lost regularly it was good to see importance placed on both its safeguarding through BUX12 and net gain through BUX13. It was also good to see key biodiversity assets like the Bure Valley Path, The Dell and key hedgerows and trees noted so that these can be specifically supported. With the importance of waterways in our Parish I also found BUX15 and the many mentions of protecting our waterways in the NP very encouraging. I also fully support BUX10 – recognizing and protecting our dark skies.

Appendix 4 Queries:

The Bure Valley Path is mentioned in two sections E & F. This doesn't seem to cover the entire length of the path in the Parish unless I am just misreading. I feel the whole length of the path in the Parish could be considered either tree or shrub/hedgerow lined.

Old or Large Trees Section – It is wonderful to see so many trees specifically noted and I'm sure there are more that I'd like to add! Trees 33-35 however are listed as Field Maple in error. 33 is a Tree of Heaven (a beautiful feature but also often considered an invasive species). From memory I believe 34 & 35 are a Sycamore and Norway Maple but this should be double checked.

In point 2 of the summary of BUX13 on page 68 I think it would be good to state that the excellent measures stipulated be targeted at increasing biodiversity generally and particularly declining and protected species. I found the current wording of locally protected species a little ambiguous as it suggests a list of species only protected in our locality. Surveys to establish what species are present and to be protected could be encouraged or required.

In point 3.10.4 I felt the wording could be changed to better reflect the type of tourism being referred to. It seems a shame to specifically mention just wild swimmers as (youths aside at the Mill Pond!) I'd say wild swimmers are on the whole very responsible in their use of the countryside and also in the minority compared to folk having a picnic/dog walkers/kayakers etc who would arguably have more environmental impact.

I wonder if there is room within the NP to include net biodiversity gain into the Local Green Spaces section (for instance leaving a margin uncut around edges or installing bird/bat boxes or even a swift tower). I would also love to see the use of pesticides in public spaces and on road verges addressed as this has a negative effect on biodiversity and could impact the health of domestic animals and people. It also looks awful when the plants die off.

BUX24: I was pleased to see scope for sensitive development and encouragement of businesses at the Bure Valley Business Centre. I do find that there is a difficulty with wanting to encourage village appropriate business that ultimately could lead to less travel via more local amenities for local residents vs not wanting traffic, particularly HGVS (section BUX22) in the village. HGVS are generally used in the supply chain for shops/cafes and I think care needs to be taken that policies like point 3 in BUX22 do not stop small businesses that would otherwise have a net benefit to the area from establishing and thriving.

I am concerned that the settlement limits and development policies don't allow for those that would like to live on the land in more off grid, private settings. There is surely scope to allow for this if it can be shown to have limited impact on the environment, show a net

gain for biodiversity and could even be used to demonstrate good practice for ecobuilding and design. In the current climate with concerns about food supply chains, climate change and a disconnect with nature it would be good to see low impact, smallholding type living spaces being encouraged, built and showcased and these would fit better in the area outside the settlement area. Perhaps the OPD system in Wales could be drawn on?

I appreciated the statement in 5.18.1 that the purpose of the NP is 'not to give out instructions as to how people should lead their lives'. With this in mind there are a couple of points in BUX18 that I do not support in the context of gaining planning permission for private dwellings (particularly individual dwellings) – the need to provide charging points for electric vehicles and the requirement for the infrastructure for super fast broadband. I would consider both of these lifestyle choices. Electric vehicles are not without serious environmental impact and charging points can be easily added post build if required and superfast broadband is not the only way to gain good access to the internet so I don't feel either of these should be a cause to not gain planning permission. Also the policy relating to concentrations of homes being within walking distance to shops and services I find a little irrelevant to our Parish as whilst our village shop is useful it does not supply a broad enough range to meet everyone's complete needs so, particularly with the many proposals and appetite for the development of greener transport, I don't feel new developments should be tied to walking distance of our village services.

BUX2 – Feoffee Cottages: It was good to see that this section was dealt with sensitively with reference to the history and ethos of the Trust and the intention to carry this forward. I was also pleased to see the retention of green space in any future development plans and that there is scope for appropriate development of the cottages despite their status in the plan as a non-listed heritage asset.

It is fantastic to see nature, wildlife and environmental impact included in discussion and planning policy. That so many things such as provision of trees, garden spaces, wildlife corridors and avoiding impermeable surfaces and water run off have been thought of is really heartening.

<p>R18</p>	<p>It is a particular strength of the Plan that the distinctive nature and character of the villages and settlements within the Parish are clearly recognised and valued. The policies on affordable housing (BUX2 and 3), water quality and water meadows (BUX14 and 15), and the emphasis on tree protection, are particularly important. (One very minor correction to page 109 - the animals on the gateposts of Hautbois Hall are in fact deer, not goats.)</p>	<p>Noted. Correction accepted with thanks.</p>
<p>R19</p>	<p>Objection to the anchor of hope being proposed a non-designated heritage asset.</p> <p>The building, over many years has been unsympathetically altered and extended and split into 2 residential properties. It has lost its character. The authenticity of the pub has long been lost and we have no licensing records regarding the operation of the property when it was a pub. The fact it survived the 1912 floods is irrelevant as all the other properties in the village existing at that time, also survived the flood. It is also not on the River Bure. We have no plans to change the property in any way.</p>	<p>Anchor of Hope removed from list of non-designated heritage assets.</p>

<p>SB01 Norfolk Constabulary</p>	<p>NPS is commissioned by Norfolk Constabulary to prepare representations on infrastructure planning policy matters. Therefore, on behalf of the Constabulary, I would make the following comments, based on the role Norfolk Constabulary have for policing, making the county a safe place.</p> <p>Central Government place great emphasis on the role of the Police and the National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 which states</p> <p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;</p> <p>Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which</p>	<p>Comments noted with thanks. Residents' key crime concerns are about speeding, which are addressed in this plan and by the parish council. 'Secured by Design' principles are recognised in the Design Guide, and Policy BUX21 (now BUX 20) has been amended to reflect 'Secured by Design' principles in response to a comment by Broadland District Council. New paragraphs 1.1.9, 1.1.10 and 2.13.1 inserted to provide context on security and crime.</p>
--	---	---

seek to improve the security of buildings and their immediate surroundings to provide safe places to live.

The Neighbourhood Plan, whilst not allocating additional sites for housing, recognises further housing development will take place in the parish, based on GNLP planning policy. This will result in an increase in the population which will add strain to existing police resources in the area. To address this, further investment will be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional stress will be placed on existing police resources.

In terms of creating and maintaining safer communities, it is disappointing there are several provisions have been omitted from this Regulation 14 version. Therefore, it is requested that the following revisions be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area.

- The Neighbourhood Plan should include an objective / policy provision to 'create and maintain a safer community and reduce crime and disorder'. This would be consistent

with NPPF advice, and it is disappointing that this important consideration is currently excluded from its provisions.

- The Neighbourhood Plan highlights within its provisions the importance of good design and details design principles in policy 4. It is therefore surprising and regrettably that the Plan is silent on crime and disorder issues and fails to offer support for the well-established principles of crime prevention through good design (as the design and layout of the built environment plays an important role in designing out crime, reducing the opportunities for and risk of anti-social behaviour along with allaying residents fear of crime and disorder). It is considered that Neighbourhood Plan policy should include a requirement that 'All new developments should conform to the 'Secured by Design' principles' and that 'the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be consistent with NPPF advice and be supported by a policy objective to 'create and maintain a safer community and reduce crime and disorder'.

- The Neighbourhood fails to include specific reference to the use of CIL monies to support police infrastructure to enhance community safety. It is considered that this omission should be addressed in the Neighbourhood Plan.

	<p>I trust that these matters can still be incorporated into the Plan objectives, policies, and provisions to reduce the opportunities for crime and disorder (and help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.</p>	
--	---	--

[SB02](#)
[Highways](#)
[England](#)

Thank you for consulting National Highways on the above Neighbourhood Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

We have reviewed the plan and note the area and location that is covered is remote from the SRN. Consequently the draft policies set out are unlikely to have an impact on the operation of the trunk road and we offer No Comment.

Alice Lawman MRTPI

Spatial Planner

Operations (East) | National Highways

Woodlands | Manton Lane | Bedford | MK41 7LW

Noted. No action needed.

	Mobile: +44 (0)7874 884387	
--	----------------------------	--

[SB03](#)
[Marine](#)
[Manage](#)
[ment](#)
[Organisa](#)
[tion](#)

Dear Buxton with Lamas planning team,

I am writing to confirm whether you have received our MMO standard response for this consultation, a copy of the standard response is attached.

No further comment is required from the MMO regarding this Neighbourhood Plan document given the location of your neighbourhood plan area.

We advise that you consider any relevant policies within the East Marine Plan Documents in regard to areas within the plan that may impact the marine environment. We recommend inclusion of the East Marine Plan when discussing any themes with coastal or marine elements.

When reviewing the East Marine Plan to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.

Noted. No action needed.

Many thanks for the opportunity to comment,

Louise Feavoyour (East Coastal Planner)

Marine Management Organisation

[SB04](#)
[Water](#)
[Manage](#)
[ment](#)
[Alliance](#)
[\(IDB\)](#)

From: Phillipa Nanson <Phillipa.Nanson@wlma.org.uk>
Sent: 01 June 2023 10:34
To: council@buxtonwithlamas.co.uk
Subject: RE: Buxton with Lamas Neighbourhood Plan - Regulation 14 (pre-submission) Consultation

Good morning,

The Board has no further comments to make. For our comments, please refer to our letter dated 11/04/2023.

Kind regards,

THE LETTER REFERRED TO IS REPRODUCED BELOW

Supporting text has been added to explain the relevance of the IDB, IDD and the Board's Byelaws, as well as an explicit requirement for applicants to seek necessary consents.

Dear Sir/Madam

RE: Buxton with Lamas Neighbourhood Plan

Norfolk Rivers Internal Drainage Board Pierpoint House 28 Horsley's Fields KING'S
LYNN Norfolk PE30 5DD

01553 819600 planning@wlma.org.uk

11/04/2023

Thank you for consulting the Norfolk Rivers Internal Drainage Board on the Buxton with Lamas Neighbourhood Plan.

Buxton with Lamas falls partially within the Internal Drainage District (IDD) of the Norfolk Rivers Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any development within the Board's area.

The principal function of the IDBs is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

The area outside the Board's IDD falls within the Board's watershed catchment (meaning water from the site will eventually enter the IDD). The Board will comment on planning for

all major developments (10 or more properties) within the IDD watershed that are likely to indirectly discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's Byelaws. We request that the Board is consulted when any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

I note that two sites within the parish have been allocated for housing developments within the Greater Norwich Local Plan (20 homes east of Lion Road, and 40 homes east of Aylsham Road). Whilst these have not been allocated within your own neighbourhood plan, in order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes, please be aware of the following where developments are proposed within or partially within the Board's IDD:

Byelaw 3- Discharge of Surface Water into the Board's District

• If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

• If (following testing) a strategy wholly reliant on infiltration is not viable and/or a development proposes to discharge surface water to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

• If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.

Byelaw 3- Discharge of Treated Foul Water into the Board's District

• If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).

Byelaw 10- Work's within 9m of Board Maintained Watercourse/s

- Should any development include works within 9 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).

Section 23 of the Land Drainage Act (1991) and Byelaw 4 - Alterations Proposed to a Watercourse

- Should any development include works to alter a Board maintained watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4).
- Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration

potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

- If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-Statutory

Page 3 Norfolk Rivers Internal Drainage Board

technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the National Planning Policy Framework). For further information regarding the Board's involvement in the planning process please see our Planning and Byelaw Strategy, available online.

If you require any further information or would like to discuss the Board's regulation in more detail, please do not hesitate to contact us.

Kind Regards, Phillipa

Phillipa Nanson

Sustainable Development Officer Water Management Alliance

[SB05](#)
[National](#)
[Grid](#)

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards

Tom

Tom Wignall

Graduate Planner

+44 01912690052 Mobile +44 07985517995

tom.wignall@avisonyoung.com | avisonyoung.com

Noted. No action needed.

Our Ref: MV/ 15B901605 15 June 2023

Buxton with Lamas Parish Council

council@buxtonwithlamas.co.uk

via email only

Dear Sir / Madam

Buxton with Lamas Neighbourhood Plan Regulation 14 Consultation May – June 2023

Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that it has no record of such assets within the Neighbourhood Plan area. NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Avison Young (UK) Limited registered in England and Wales number 6382509.

Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ

T: +44 (0)191 261 2361 F: +44 (0)191 269 0076

avisonyoung.co.uk

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young

Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ

Ellie Laycock, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission National Grid House

Warwick Technology Park

Gallows Hill

Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094 matt.verlander@avisonyoung.com For and on behalf of Avison Young

[SB06](#)

[National](#)

[Gas](#)

(GAS PIPE MAP LOADED INTO THE DRIVE)

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgas.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards

Tom

Tom Wignall

Graduate Planner

+44 01912690052 Mobile +44 07985517995

Noted. National Gas pipeline map referenced at 2.9.4

tom.wignall@avisonyoung.com | avisonyoung.com

Dear Sir / Madam

Buxton with Lamas Neighbourhood Plan Regulation 14 Consultation May – June 2023

Representations on behalf of National Gas Transmission

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed by or in close proximity to National Gas Transmission Assets

Following a review of the above document we have identified the following National Gas Transmission assets as falling within the Neighbourhood area boundary:

Asset Description

Gas Transmission Pipeline, route: BACTON TO ROUDHAM HEATH

A plan showing details of National Gas Transmission's assets is attached to this letter.
Please note that this plan is illustrative only.

National Gas Transmission also provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please see attached information outlining guidance on development close to National Gas

Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Avison Young (UK) Limited registered in England and Wales number 6382509.

Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ

T: +44 (0)191 261 2361 F: +44 (0)191 269 0076

avisonyoung.co.uk

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgas.uk@avisonyoung.com

Avison Young

Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ

Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

National Gas Transmission National Grid House Warwick Technology Park Gallows Hill

Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094 matt.verlander@avisonyoung.com For and on behalf of Avison Young

[SB07](#)
[Natural](#)
[England](#)

Dear Mrs Apps-Green

Buxton with Lamas Neighbourhood Plan - Regulation 14 (pre-submission)

Thank you for your consultation on the above dated 09 May 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on the Buxton with Lamas Neighbourhood Plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact:
consultations@naturalengland.org.uk. Yours sincerely

Sally Wintle Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Suggestions in annex have been addressed throughout plan.

<p>SB08 Anglian Water 01</p>	<p>2.9 Utilities</p> <p>Anglian Water notes the references to water supply and water recycling provided by Anglian Water to the neighbourhood plan area.</p> <p>Our recently published Drainage and Wastewater Management Plan sets out the medium and long term strategies for water recycling catchments across the Anglian Water region.</p> <p>Anglian Water is also working proactively with the Norfolk local planning authorities to address the nutrient neutrality issue affecting a number of catchments where nitrates and phosphates are impacting on the condition of European Sites (The River Wensum SAC and The Broads SAC) including the River Bure catchment.</p>	<p>Noted with thanks</p>
--	---	--------------------------

[SB08](#)
[Anglian](#)
[Water 02](#)

Paragraph 3.10.4

Anglian Water recognises that storm overflows are not a suitable solution to deal with the issue of overloading on the sewer network during periods of heavy rainfall. Despite being consented by our regulator, the Environment Agency, it is understandable that no one finds it acceptable that even extremely diluted sewage reaches our rivers. Event Duration Monitors have already been installed on many of our storm overflows and will be in place across all storm overflows by the end of this year - this provides clear data on when and for how long these assets spill and enable us to target investment accurately. Further information can be found on our website: Storm overflows (anglianwater.co.uk)

As part of our Get River Positive commitment, Anglian Water has pledged to ensure storm overflows and sewage treatment works do not harm rivers. We have also committed to be as transparent as possible with the data we collect about our water recycling network and the improvements that we are making, especially around storm overflows. We have provided an online map that shows our latest investment schemes to improve the environment, including 2022 storm overflow data and the river network. Information can be found on our website: <https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/improving-rivers-and-coastlines> - this shows for example that there were no recorded spills in 2022 at the Buxton-Coltishall Road TPS.

Inserted new paragraph 3.10.5: "In response to consultation Anglian Water says it recognises that storm overflows are not a suitable solution to deal with the issue of overloading on the sewer network during periods of heavy rainfall. Anglian Water also stated it has pledged to ensure storm overflows and sewage treatment works do not harm rivers."

	<p>Anglian Water is also working with local river groups and communities to improve the river health in our region – recently launching a pilot Citizen Science programme to gain a better understanding of river health and engage more closely with local interest groups.</p>	
<p>SB08 Anglian Water 03</p>	<p>Policy BUX 4: Development and design</p> <p>Anglian Water welcomes reference to the Design Guidelines and Codes in the policy, as this document provides advice on SuDS, and sustainable construction measures, including more ambitious water efficiency standards and water efficient devices.</p>	<p>Noted with thanks</p>

<p>SB08 Anglian Water 04</p>	<p>Policy BUX 12: Protecting sites of existing biodiversity value</p> <p>Anglian Water supports the aims of the policy in protecting biodiversity and specifically criterion 6 requirement of sustainable drainage systems (SuDS) where impermeable surfaces such as roads are delivered as multi-functional benefits can be achieved.</p>	<p>Noted with thanks</p>
<p>SB08 Anglian Water 05</p>	<p>Paragraph 5.14.6</p> <p>Anglian Water notes the reference to the impacts of nutrient pollution on the Broads SAC. As previously stated, Anglian Water are working positively with the Norfolk local planning authorities to help deliver mitigation projects that will enable development to demonstrate nutrient neutrality.</p> <p>Policy BUX 14: Protecting water quality and managing surface water responsibly</p> <p>Anglian Water supports the aims of the policy as this aligns with our purpose and long term ambitions. Whilst the wording regarding nutrient neutral development is a matter for the local planning authority to comment on, Anglian Water support the requirements for development proposals to be accompanied by a Surface Water Drainage Strategy and ensure that all surface water is managed appropriately through SuDS.</p>	<p>Noted with thanks</p>

	<p>Whilst it is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented and the necessary measures are in place.</p>	
<p>SB08 Anglian Water 06</p>	<p>Paragraph 5.15.6</p> <p>Anglian Water is pleased to see the reference to our flagship River Ingol wetland near Ingoldisthorpe which was created in partnership with Norfolk Rivers Trust as a natural treatment plant and biodiversity asset. This wetland has provided the blueprint for a further 26 wetlands to be delivered across our region to help protect rivers including precious chalk stream habitats. Further details can be found on our website: https://www.anglianwater.co.uk/news/anglian-water-unveils-plans-for-uks-most-ambitious-new-wetland-programme/</p>	<p>Noted with thanks</p>

	<p>Policy BUX 15: Protecting and enhancing our valued water meadow landscape</p> <p>Anglian Water supports the aims of the policy to improve water quality, provide positive policy ambitions for nutrient neutrality mitigation projects, and effective management of the water environment.</p>	
<p>SB08 Anglian Water 07</p>	<p>Policy BUX 16: Local Green Spaces</p> <p>Anglian Water notes the areas proposed to be designated as local green space. We agree the policy provides scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as mains water and sewer pipes consistent with national Green Belt policy.</p>	<p>Noted with thanks</p>

[SB08](#)
[Anglian](#)
[Water 08](#)

Policy BUX 17: Delivering sustainable design

Anglian Water is supportive of the policy aims to deliver sustainable design for new development within the neighbourhood plan area, particularly the reference to proposals minimising water usage, as referenced in the Design Guidelines and Codes EE01 - Features in Dwellings.

As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater harvesting and reuse, and greywater recycling.

The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be included in the neighbourhood plan using a fittings-based approach.

The Greater Norwich Local Plan requires water consumption to be set at no more than 110 litres per person per day. This is also now reflected in the supporting text to Policy BUX 17.”

[SB08](#)

[Anglian](#)

[Water](#)

[FULL](#)

2.9 Utilities

Anglian Water notes the references to water supply and water recycling provided by Anglian Water to the neighbourhood plan area.

Our recently published Drainage and Wastewater Management Plan sets out the medium and long term strategies for water recycling catchments across the Anglian Water region.

Anglian Water is also working proactively with the Norfolk local planning authorities to address the nutrient neutrality issue affecting a number of catchments where nitrates and phosphates are impacting on the condition of European Sites (The River Wensum SAC and The Broads SAC) including the River Bure catchment.

Paragraph 3.10.4

Anglian Water recognises that storm overflows are not a suitable solution to deal with the issue of overloading on the sewer network during periods of heavy rainfall. Despite being consented by our regulator, the Environment Agency, it is understandable that no one finds it acceptable that even extremely diluted sewage reaches our rivers. Event Duration Monitors have already been installed on many of our storm overflows and will be in place across all storm overflows by the end of this year - this provides clear data on

when and for how long these assets spill and enable us to target investment accurately. Further information can be found on our website: Storm overflows (anglianwater.co.uk)

As part of our Get River Positive commitment, Anglian Water has pledged to ensure storm overflows and sewage treatment works do not harm rivers. We have also committed to be as transparent as possible with the data we collect about our water recycling network and the improvements that we are making, especially around storm overflows. We have provided an online map that shows our latest investment schemes to improve the environment, including 2022 storm overflow data and the river network.

Information can be found on our website:

<https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/improving-rivers-and-coastlines> - this shows for example that there were no recorded spills in 2022 at the Buxton-Coltishall Road TPS.

Anglian Water is also working with local river groups and communities to improve the river health in our region – recently launching a pilot Citizen Science programme to gain a better understanding of river health and engage more closely with local interest groups.

Policy BUX 4: Development and design

Anglian Water welcomes reference to the Design Guidelines and Codes in the policy, as this document provides advice on SuDS, and sustainable construction measures, including more ambitious water efficiency standards and water efficient devices.

Policy BUX 12: Protecting sites of existing biodiversity value

Anglian Water supports the aims of the policy in protecting biodiversity and specifically criterion 6 requirement of sustainable drainage systems (SuDS) where impermeable surfaces such as roads are delivered as multi-functional benefits can be achieved.

Paragraph 5.14.6

Anglian Water notes the reference to the impacts of nutrient pollution on the Broads SAC. As previously stated, Anglian Water are working positively with the Norfolk local planning authorities to help deliver mitigation projects that will enable development to demonstrate nutrient neutrality.

Policy BUX 14: Protecting water quality and managing surface water responsibly

Anglian Water supports the aims of the policy as this aligns with our purpose and long term ambitions. Whilst the wording regarding nutrient neutral development is a matter for

the local planning authority to comment on, Anglian Water support the requirements for development proposals to be accompanied by a Surface Water Drainage Strategy and ensure that all surface water is managed appropriately through SuDS.

Whilst it is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented and the necessary measures are in place.

Paragraph 5.15.6

Anglian Water is pleased to see the reference to our flagship River Ingol wetland near Ingoldisthorpe which was created in partnership with Norfolk Rivers Trust as a natural treatment plant and biodiversity asset. This wetland has provided the blueprint for a further 26 wetlands to be delivered across our region to help protect rivers including precious chalk stream habitats. Further details can be found on our website:
<https://www.anglianwater.co.uk/news/anglian-water-unveils-plans-for-uks-most-ambitious-new-wetland-programme/>

Policy BUX 15: Protecting and enhancing our valued water meadow landscape

Anglian Water supports the aims of the policy to improve water quality, provide positive policy ambitions for nutrient neutrality mitigation projects, and effective management of the water environment.

Policy BUX 16: Local Green Spaces

Anglian Water notes the areas proposed to be designated as local green space. We agree the policy provides scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as mains water and sewer pipes consistent with national Green Belt policy.

Policy BUX 17: Delivering sustainable design

Anglian Water is supportive of the policy aims to deliver sustainable design for new development within the neighbourhood plan area, particularly the reference to proposals minimising water usage, as referenced in the Design Guidelines and Codes EE01 - Features in Dwellings.

As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater harvesting and reuse, and greywater recycling.

The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be included in the neighbourhood plan using a fittings-based approach.

Anglian Water welcomes the opportunity to comment and wish the Parish Council and Neighbourhood Plan Steering Group every success in taking the neighbourhood plan forward to submission.

Kind regards,

Tessa Saunders MRTPI

Spatial Planning Advisor – Sustainable Growth

Quality & Environment

[SB09](#)
[Historic](#)
[England](#)

By e-mail to: enquiries@bwlneighbourhoodplan.org Our ref: Your ref:

Date: Direct Dial:

Dear Clerk,

Ref: Buxton with Lammas Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Buxton with Lammas Neighbourhood Plan.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

The list of NDHA has been thoroughly reviewed in line with these comments. Archaeological assets and others in the NHER have been considered and some included.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout. In particular Policy BUX 11. We welcome the focus on non-designated heritage asset but also consider this should be extended to the range of non-designated archaeological sites, information

on which is held in the counties HER. We recommend you contact the county archaeological teams for advice.

For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of

the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Will Fletcher

Development Advice Team Leader Will.Fletcher@historicengland.org.uk

[SB10](#)
[Broadland District Council](#)
[01a](#)

General

The documents have a number of accessibility issues, mainly related to alternate text, which will need to be addressed before the Council can accept these at the submission stage. All of the documents need to meet the Web Content Accessibility Guidelines (WCAG) 2.1, in order for us to upload these to the Council website at the submission stage. This legislation also applies to the Parish Council. The Council would be happy to discuss this with the steering group, if needs be.

Where a policy only includes one paragraph, the Council would recommend against numbering, as it implies that there should be further policy paragraphs. E.g., Policy BUX 7 and Policy BUX 8 – remove the figure ‘1’.

Para 1.1.1, p7

The Council does not consider that the final sentence of paragraph 1.1.1 accurately portrays the status of the Neighbourhood Plan in the decision-making process.

The document will be made fully accessible.
Paragraph numbering. **Para 1.1.1.** Last sentence to has been rationalised. Paragraph 1.1.1 has been amended as follows: “Planners must follow use the neighbourhood plan when making decisions about planning applications in the parish subject to other material considerations.”

As set out in paragraph 006 of the Planning Practice Guidance on Neighbourhood Plans, Planning law requires decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.

Therefore, it is not the case that in determining planning applications planners “must follow the neighbourhood plan”. Rather, in law, a decision maker must decide whether in light of the Development Plan (as a whole) a proposal does or does not accord with it, and if it does not whether there are relevant material considerations that indicate that despite the conflict an application for planning permission should nonetheless be granted permission.

The final sentence of paragraph 1.1.1 should be reflective of the above.

1.2 Planning Policy Context, p8

It would be helpful to include a para here to introduce the GNLP and how this fits in the planning context.

[SB10](#)
[Broadland District Council](#)
[01b](#)

Map 2, p9 & 2.18.2

CWS are not Norfolk County Council per se but overseen by a partnership chaired by Norfolk Wildlife Trust (NCC are involved)

Para 2.2.2, p13

The term 'cadre' is quite specific and means a small group of people specially trained for a particular purpose/profession. The Council would query whether it is an appropriate term to use in this context. Given the importance of using plain, accessible language in planning documents, the Council would suggest using a simpler term such as 'group'.

Map 5, p25

There is an issue with the legibility of this map. Can this be made any clearer?

Norfolk County Council has been removed from references to CWS in maps and text. The word 'cadre' has been replaced with 'group' in para 2.2.2. Map 5 has been remade.

[SB10](#)
[Broadland District Council](#)
[02](#)

Objective 1

The Council would note that the overall strategy for the pattern of development are matters for strategic policies to be set out by the Local Planning Authority through its local plan.

Recognising that Objective 1 of the Neighbourhood Plan makes reference to the local plan, care should be taken to ensure that it is not implied through objectives, policy or explanatory text of the Neighbourhood Plan that the plan can dictate any outcome in terms of those strategic policy matters that are the substance of the Local Plan.

Chapter 5, p37 onwards

There are several references made here to the Broadland Development Management DPD. When using acronyms, the document should correctly be referred to as DM DPD and not DMP DPD.

Noted. The basic conditions require the NP to have general conformity with the strategic elements of the Local Plan. The NP can have its own spatial strategy policy so long as it is in general conformity with the strategic elements of the Local Plan.

DMP DPD corrected to DM DPD throughout.

[SB10](#)
[Broadland District Council](#)
[03](#)

BUX1: A strategy for limited and sustainable growth

In part 2b, Class E covers a wide range of uses, some of which might not be fitting for a rural area such as this. It would be advisable to be more specific about uses here, rather than referring to the Use Class.

1. The Council does not raise any specific points in relation to this element of the policy but notes that it will be necessary for the decision maker to take account of the development plan taken as a whole in judging whether a proposal is in accordance with it.
2. As drafted, this bullet is negatively worded. The Council considers it would be better, and more consistent with the expectations of paragraph 16(b) of the NPPF, for the policy to set out a positive framework for non-residential development outside of settlement boundaries by defining what types of development will be permitted and on what basis.

In regard to the current policy, it is notable that no specific reference is made to community facilities (other than in relation to outdoor recreational uses). Both the current Village Hall, and associated recreation ground, and the recreation ground and scout HQ

Policy has been amended to address these concerns and following further discussion with officers at Broadland District Council.

adjacent Aylsham Road lie outside the defined settlement boundary and there may reasonably be a need or desire to undertake further associated development or redevelopment in these areas. As such, the Council would recommend that particular community uses (as defined within Class F1) are incorporated into the policy. Consideration should also be given to whether the policy supports the sustainable growth of all types in the rural area (as opposed to just those falling in the, albeit expansive, E class designation) in accordance with paragraph 84 of the NPPF.

2 (b) should be amended to state “

the development and use of land appropriate ...”. This will ensure that the policy clearly relates not just to the material change of use of land but also to the carrying out of any associated building, engineering, mining or other operations necessary to the employment or tourism use concerned.

The Council would also recommend that the policy wording is amended to say “consistent” with other provisions of the development plan. This better reflects the balanced approach to decision making that must be taken, considering the extent to which a development proposal is in accordance with the policies of the development plan, taken as a whole.

3. Point 3 of the policy is again negatively worded, with the intention of restricting uses other than those specifically As in the case of point 2, the Council would strongly recommend that the policy is redesigned to be positively worded setting out scenarios within which development would be permitted.

Whilst the policy refers to a number of allowable developments, no provision appears to be made for some other types of development that, subject to criteria, may be allowed under the provisions of the current development plan and national policy framework. Such development includes entry level exception sites, replacement dwellings, change of use of a dwelling, residential institutions, sites for gypsies and travellers, tourist accommodation or extensions to dwellings.

It is unclear to the Council whether these have been purposely omitted from the policy, and if so what the justification for doing so is. In order to ensure that the plan can be considered to be consistent with the Basic Conditions, and in particular conditions (a), (d) and possibly also (e), the Council would strongly recommend further consideration is given to the policy in regard to the types of development that are restricted. This issue could be overcome by recasting the policy as a positively worded policy that sets out

circumstances where development would be allowed, rather than seeking what appears to be strict restrictions on development.

4. As drafted the policy requires proposals to “bring overall benefit to the parish”. A straight-forward reading of this requirement would be that, taking everything into account the Neighbourhood Plan seeks to influence proposals to result in some sort of advantage or profit to the parish itself.

In the first instance, the Council was somewhat unclear on what advantage or profit the parish is seeking as a result of such developments. In order to ensure that the policy is clear, and that it is evident how a decision maker should react to development proposals, in accordance with paragraph 16(d) of the NPPF, the Council considers that this matter should be clarified.

In regard to any benefit sought in policy, it is important to bear in mind that a development cannot be required to provide a contribution unrelated to the development authorised. Also, that the use of conditions and obligations is only justified where they are, amongst other things, necessary, relevant/related to the development permitted and otherwise reasonable.

The Council also notes that paragraph 155 states that plans should provide a positive strategy for renewable and low carbon energy that maximises the potential for suitable development. That paragraph 158 of the NPPF states that LPAs should recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions, and that (with the exception of a proposed wind energy development) states that applications should be approved if its impacts are (can be made) acceptable.

The Council is unclear currently how the requirement to provide an unspecified local community benefit is consistent with these elements of the NPPF, or if it is not why this is justified. The council would also note that the final sentence of point 4, requires all renewable, decentralised and community energy generating proposals to be supported by the community. This goes beyond the limited exception provided to wind turbines under footnote 54 of the NPPF, however the Council was again unable to establish the justification for the wider application of the need to demonstrate a proposal is backed by the community, as opposed to simply being acceptable on its own planning merits.

In 3c, there is an apostrophe needed in 'Broadlands'. Also references to 'DMP DPD' should be 'DM DPD'.

Para 5.2.1, p41

Should 'socially' read 'social'?

Para 5.2.4, p41

Should 'speaks' read 'seeks'?

Para 5.6.3, p49

In the second sentence, one of the 'is' needs deleting.

[SB10](#)
[Broadland District Council](#)
[04](#)

BUX3: Affordable housing for local people on rural exception sites, p44

To ensure that it is evident how a decision maker should react to a development proposal, the Council would recommend that the policy sets out what is meant by small scale. This would be best set out on the basis of what typically should be considered small scale development in the Parish. This should be defined with reference to overall size of the village and with regards to its form and character. Such an approach would help provide clarity without setting a rigid restriction that may be difficult to justify.

The Council would also recommend that, in setting any typical standard, the Steering Group engages with registered providers to ensure that the scale is set at a level so as to be attractive to delivery partners.

The Council previously provided the steering group with examples of the Broadland exception sites local lettings policy. The Council note a simplified version has been included (in 5.3.5). The group may wish to re-include the wording around current residents of the parish of Buxton w. Lamas for less than 3 years – there are no timescales for households needing to move to provide welfare support, and only one year timescale for those working in the parish.

Following this comment, the NP steering group has liaised with the Broadland Housing Enabling Officer. Following this, the supporting text has been amended to provide more explanation on what small scale might mean on a site by site basis. In addition, the local connection criteria has been updated.

[SB10](#)

[Broadland District Council](#)
[05](#)

BUX4: Development and Design, p47

The Council notes that the policy seeks to pick up specific elements from the Design Code and translates these into policy requirements. Whilst the Council does not object to this approach in principle, there are some instances where wording used in the policy is not consistent with that in the design guidance e.g. “maintain the density and scale of development found in the vicinity of the development site” as opposed to “maintaining the density and scale of development within its locality”.

Similarly, “respect the pattern of buildings found in the vicinity” rather than “respect the particular building patterns of the settlement”.

The Council has not exhaustively gone through the policy to identify differences. It is, however, unclear whether the use of different language is meant to imply that the policy should be interpreted differently to the content of the design guidance, the use of ‘vicinity’ does appear to imply considering a smaller area that either the term ‘locality’ or ‘settlement’ does.

The policy has been amended in light of comments made, specifically Clause 2a) regarding density requirements, removal of garden size specifications (in line with Design Guide changes), building materials, clarification that contemporary designs will in principle be supported, boundary treatment clause and further detail regarding agricultural buildings.

If it is intended that the policy seeks to achieve something different to the design guidance and code, then this could usefully be clarified. If this is not the case then the Council would advise that, to avoid confusion, consistent terminology should be used.

Specific policy elements:

Part a)

- Proposals should maintain the density and scale of development found in the vicinity of the development site and be in keeping with the predominant development pattern (e.g., nucleated in Buxton)

This could be problematic in very low-density areas with large and long gardens. For example, early mid C20th housing, which has very large and long gardens (a feature of council housing for self-growing etc.), resulted in very low densities, but this is no longer a requirement or necessarily desired by tenants/house buyers. Therefore, a higher density with similar house types but smaller gardens would be considered appropriate. Garden sizes are also covered in a separate part of the policy.

The policy needs to have regard to Para 130 (c) of the NPPF: “Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”. Therefore, the Council consider it would be better to say, “Proposals which are sympathetic and have regard to...” rather than “Proposals should maintain...”.

Sub-paragraph g): It may be that some building materials are no longer desirable, even though they are present within a character area. Therefore, the Council would recommend including wording such as “unless those materials are not considered sympathetic to local character and distinctiveness” at the end of the first sentence. Also, flint is not heavily used in this area, so the Council would suggest including a statement that any flint should be used in limited quantities.

[SB10](#)
[Broadland District Council](#)
[06](#)

BUX5: Protecting residential amenity, p48

This policy looks to protect residential amenity in terms of pollution and noise. However, as the title of the policy refers to residential amenity, in a general sense, it should probably cover other important aspects of amenity such as overlooking, loss of light, overbearing impact and over-shadowing. Appreciating that Buxton is not in the local authority area for South Norfolk, there are policies within the SNC

Development Management Policies Document (3.13

& 3.14) that address these issues, which could be a good reference point in terms of how to address such issues.

The Council would recommend that it would be beneficial for the Neighbourhood Plan to be more precise about what it means by the term “general disturbance”. Whilst it may in certain instances be appropriate to restrict new vehicular accesses where they are very close to existing properties on amenity grounds, the Council has some reservations about whether it is likely to be appropriate to restrict development on the basis of disturbance arising from the general use of the highway by traffic generated by developments of the type likely to occur in Buxton with Lamas.

BUX 5 revised as follows: "1) All development proposals (alterations, extensions, conversions, infill developments, residential and non-residential) are expected

to ensure a reasonable standard of amenity for people: This means: a) avoiding

overlooking and loss of private residential amenity space loss of day light, overshadowing and overbearing impact

b)

Ensure existing occupants of neighbouring properties and future occupiers of the proposal are not exposed

		<p>to: • Unacceptable level of pollution that may arise from the development. This can include noise, smoke, fumes,</p> <p>dust and lighting during construction and occupation. • Unacceptable levels of general disturbance arising from the development through activities such as traffic movements into and out of, and within the site during construction and occupation.</p> <p>2) Planning permission will be refused where proposed development would lead to an unreasonable impact on existing neighbouring occupants, the amenity of the area or a poor level of amenity for future occupiers of the proposed development.”</p>
--	--	--

[SB10](#)
[Broadland District Council](#)
[07](#)

Para 5.6.1, p49

It may be clearer to simply state ‘three different landscape characters...’ here, as landscape ‘type’ and landscape ‘area’ are separate (and different) terms. Elsewhere it is clearer that there is a distinction.

Para 5.6.3 & 5.6.4, p49

These paragraphs appear to be confusing landscape character with built form character. Also, there doesn’t appear to be any consideration of the character of the two other ‘villages’ here.

Map 10, p 50

The colour coding for A2 & E2 has been swapped on the key.

5.6.1 Amended “character types” to “characters”.
Inserted reference to 5.6.6 (amended to 5.6.8 following insertions below).

5.6.3 Retitled “Buxton Village” to “Buxton and The Heath”

New paragraph 5.6.5 inserted:

”

Little Hautbois

Little Hautbois is a quintessentially rural hamlet, a decayed mediaeval village. It comprises a small number of residential properties set within open countryside, chiefly arable fields and pasture, with the River Bure on its south western boundary. The

BUX6: Protecting and enhancing landscape character

There may be circumstances where the loss of a landscape feature as a result of development is unavoidable. The Council would therefore recommend that bullet 2 should be expanded to address how a decision maker should react to a development proposal in these instances e.g., securing adequate compensatory measures.

The Council notes the Neighbourhood Plan's desire for substantial landscape buffering. The purpose of this element of the policy is to avoid harsh settlement edges and maintain tranquillity. It is only likely to be justifiable to require of a development what is necessary to reasonably achieve this outcome.

The Council does not consider it is appropriate to set out that any and all development proposals that encroach into the countryside will not be permitted is reasonable taking account of the NPPF policies in relation to Rural Housing and supporting a prosperous rural economy, the principles of which are echoed by a number of policies in the JCS. Therefore, this element of the policy should be removed or amended such that it relates to the proportionate protection of the character and beauty of the countryside.

Bure Valley Railway and path cut underneath the road junction at Little Hautbois.”

New para 5.6.6 inserted:

”Badersfield

The portion of Badersfield which is within the Parish is a conservation area, bounded by Barnby Road, Lamas Road, Hautbois Road and Jaguar Drive. It consists of houses of standard design for RAF officers and has a green and spacious feel, with many mature trees and grass edges. There are views of open fields from the rear of many of the houses, towards Lammas and Badersfield.”

Map 10 key corrected.

		<p>BUX 6 Clause 2 amended to: “Within a development site, proposals will be expected to retain or enhance existing features of landscape value including trees, hedgerows and water features. Where potential adverse impacts on key features of landscape value are identified, landscape mitigation measures will be required in order to ensure the scheme successfully assimilates into its surroundings. “</p> <p>BUX 6 Clause 4 the following appended: “Where a new development extends the village on a significant approach road, it should recognise its role as a new village gateway, and create a sensitive transition from open countryside to village streets.”</p>
--	--	--

		<p>BUX 6 Clause 5 amended to: “Where otherwise acceptable, development proposals in Lammas, Little Hautbois and Badersfield should respond to existing settlement patterns and built form character. Proposals which physically encroach into the open countryside, will not be permitted, unless landscape appropriate mitigation measures are secured that can ensure the scheme successfully assimilates into its countryside surroundings.”</p>
--	--	--

<p>SB10 Broadland District Council 08</p>	<p>BUX7: Protecting parish gardens from inappropriate development, p52</p> <p>Subdividing gardens would result in increasing density so would not be compatible with BUX4, as currently worded. This links back to comments on BUX4.</p> <p>The policy could be considered overly- restrictive. The Council would suggest that the first sentence is amended to state 'will not normally be permitted'.</p> <p>It is also not clear if all of the criteria are meant to apply in every case, or whether it is an 'and/or' list?</p> <p>Terms such as 'sufficient' and 'adequate' are not quantifiable and therefore subjective. This would need clarification. Is there some sort of metric in order to determine this? Is it related to house size, number of bedrooms etc.?</p> <p>Parking standards (part c) are already covered by Norfolk County Council guidance.</p>	<p>Rewording of clause 2a) in BUX 4 addresses the tension with policy BUX 7 that allows, under some circumstances, subdivision of gardens (see under comment SB10 05). BUX 7 revised as follows: "1. <i>Proposals for development on sites that form part of a garden or group of gardens or that subdivide an existing residential plot will not be permitted supported unless: a) Sufficient Ggarden space and space around existing dwellings is retained, resulting in a density that responds appropriately to site context, including the density and scale of development within the vicinity of the development; b) especially where these spaces and any trees and other Key landscape features (hedgerows, trees, amenity land) are retained, where these are worthy of retention due to their contribution to the character of the area, their importance to biodiversity or to the adequate management of surface water in the area; c) The proposal protects residential amenity in line with Policy BUX 5; and d) Provision is made for adequate amenity space, vehicular access arrangements and parking spaces</i></p>
---	--	---

In reference to point a), the Council would suggest the policy could include recognition that suitable mitigation schemes may be acceptable.

(in line with Norfolk County Council guidance) for the proposed and existing properties.”

[SB10](#)
[Broadland District Council](#)
[09](#)

BUX8: Views to be protected, p53

As has been the case with other draft Neighbourhood Plans the Council have commented on previously, there is a confusion here between what constitutes a specific view, as opposed to a description of the general scene and character. There does not appear to be a definitive methodology for this strand of the Plan, and it comes across as rather subjective, which could be hard to defend if needed. What are the criteria for defining Priority and Locally Iconic views?

Whilst the policy wording for BUX 8 allows for enhancement, this is not mentioned in the supporting text.

Bullet (a) seeks to protect identified views from any change. Whilst it would probably be unfair to read it in this way, it may be useful to clarify that this bullet is (presumably) concerned with detrimental change.

Furthermore, to protect views from any change would represent the highest level of protection possible under the planning system. Such protections would need very strong justification and is likely only to be appropriate where views of nationally and

Policy has been amended to clarify that all development proposals must respect the Priority View and the Locally Iconic Views. Clauses a and b have also been subjected to minor wording amendments. Information in the appendix has been expanded upon in order to provide further clarity regarding expectations on views that are potentially impacted by development proposals. This will assist with the implementation of the policy.

internationally important views and vistas are concerned. This Council is uncertain that such justification exists.

As such, the Council would recommend that the policy is amended to such that it protects the views from any significant detrimental change.

The Council would recommend similar amendments to category (b) views albeit, related to the key features of the view.

The Council would also note that whilst there are clear descriptions of the views that are sought to be protected in appendix 1, these do not have a clear reasoned justification for their inclusion, such as whether they include significant features of the area recognised in evidence, e.g., the landscape character SPD. The appendix could be usefully expanded in this way, such proportionate evidence is likely to be necessary to justify the policy through its examination.

If particular key features are sought to be protected under category (b) of the policy, then it would be useful for the appendix concerning these views to set out what the key features are.

The Council would also note that some of the maps of the views are small, which makes it difficult to identify the specific viewpoint or extent of the view that is sought to be protected. These should be enhanced to ensure they are easily readable.

[SB10](#)
[Broadland District Council](#)
[10](#)

BUX9: Lammas, Little Hautbois and Badersfield Areas of Separation

Two areas are shown on Map 13. An appropriate legend should be included on this map that identifies the two different areas shown.

In regard to the policy, the policy seeks to restrict development, other than for land uses that need to be located in the countryside.

The Council would note that the overall strategy for the pattern of development are matters for strategic policies to be set out by the Local Planning Authority through its local plan. Whilst it may well be legitimate to seek policies that would avoid the coalescence of settlements, the current policy appears to extend over a large area, which exceeds what may be needed to achieve this outcome.

In respect of the policy wording, it is unclear which land uses are intended to be allowed under the policy or how this relates to development identified under point 3 of policy BUX1, specifically if it is the intention to restrict acceptable uses further in this area. If this is the case, then appropriate justification should be provided.

Reference added to clarify this policy ties in with BUX1. Clause c) "views" replaced with "landscape"
Clauses 2a and 4a amended to remove "and undeveloped".

Noting the uncertainty about countryside uses that are actually intended to be allowed by the policy, the Council is concerned that the Neighbourhood Plan is to all intents and purposes seeking to establish a restriction on development equivalent to or exceeding that set out within Green Belt Policy. In this respect the NPPF is clear that new Green Belts should only be established in exceptional circumstances, the establishment of policies with similar purposes and effects to Green Belt should likely be read in this context. It is unclear that such exceptional justification is available for this policy.

The Council also notes that 2(c) of the policy seeks to protect views. It is unclear how this relates to the plans' policy on views and whether it is necessary to repeat such policy criteria here.

[SB10](#)
[Broadland District Council](#)
[11](#)

BUX11: Conserving and enhancing our heritage assets, p62

A heritage statement is not necessarily a given requirement as part of the planning application process in relation to NDHAs. The Council would therefore recommend that part 3 states the applicant ‘should’ prepare a statement (where a proposal affects a NDHA), rather than ‘will be required to’.

The Council would recommend that the Steering Group reconsiders the non-designated heritage list to assess whether all of the identified assets objectively fulfil the relevant criteria. For example, as regards the site for the former St Mary’s Church (asset 1), the assessment states that the remains are assumed to be underground – designation cannot be based on an assumption and, if it is underground, it would be an archaeological issue rather than a NDHA. Items 22-24 do not appear to have been assessed and so the Council would query their inclusion.

The limited justification, or absence of justification in certain instances, brings into question whether all of the assets identified can readily be defined as non- designated heritage assets.

The list of NDHA has been reviewed following Reg 14; more information is provided in the appendix.

[SB10](#)
[Broadland District Council](#)
[12](#)

Para 5.12.7 (p64) & Appendix

This should read Hedgerows Regulations (not Hedgerow Regulations; both words are plural).

There may be other criteria that apply that result in 'important hedgerows', so the Council would suggest avoiding making conclusions, or a definitive list here.

It might be better to have a generic policy that promotes hedgerows (their retention, restoration, and enhancement) and also presumes in favour of the retention of any found to qualify as 'important' under the Regulations.

Map 16, p 65

This map is a little unclear. A higher resolution version might make this easier to read.

Map 16 to be updated with NBIS data / GNLP / other data with sources listed and 5.12.5 amended to reflect this. Appendix 4 expanded. 5.12.7 amended as follows: **“Important hedgerows are those which meet the criteria for ‘importance’ under the Hedgerows Regulations 2017. This includes hedgerows that In the parish, hedgerows qualify either because they are part of a field system that existed before 1845 or because they include 7 or more woody species specified in Schedule 1, Part II Criteria, paragraph 7 (1)8.** “A sentence has been added to paragraph 5.12.13 to clarify BNG may trigger additional measures, as follows: **”Please note, compliance with Biodiversity Net Gain legislation may necessitate additional measures.**

Para 5.12.13, p65

BNG might result in greater requirements, so perhaps it is better to stress that these proposed ratios are minimums.

BUX12: Protecting sites of existing biodiversity value, p66

It would be beneficial if the marked areas shown on Map 16 were identified individually or in smaller groups on a larger scale map to ensure that the boundaries of these sites could be easily understood.

The Council would also note that there appears to be limited evidence or assessment that underpins the identification of the additional sites of biodiversity value. Paragraph 31 of the NPPF sets out that the preparation and review of all policies should be underpinned by relevant, adequate, proportionate and up-to-date evidence that justifies the policies concerned.

In order to ensure that the additional allocations meet the basic conditions, as they relate to consistency with National Policy, and to ensure they can be given appropriate weight

	<p>in the determination of applications for planning permission, the Council would recommend that further evidence is provided to justify the local designations contained within the plan.</p>	
--	---	--

[SB10](#)
[Broadland District Council](#)
[13](#)

BUX14 Protecting water quality and managing surface water responsibly

Point 2 of the Policy does not distinguish the types of development proposals that are affected by nutrient neutrality constraints. The types of plans and projects affected by nutrient neutrality are identified in point 4.0 of the Natural England water quality and nutrient advice letter

[ne-water-quality-and-nutrient-neutrality- advice-16-03-2022-issue-1-final \(southnorfolkandbroadland.gov.uk\)](#). The Council does not consider that development beyond those identified in the Natural England guidance are likely to be screened in for the purposes of Appropriate Assessment. Therefore, the Council would recommend that the word “where relevant” are added to the start of the policy.

Points 4 and 5 refers to development proposals involving new build. The Council is unclear what the plan means by new build. For example, is it intended to cover all types of building operations that fall within the scope of the definition of development or is it only intended to relate to specific types of building operation? If the former, then the Council would question whether the requirements are necessarily fair and reasonable in relation to minor development works. The Council would recommend that this element of the policy is reviewed

Amendments made to clause 2 in line with these comments. Clause 4 has been amended to reflect Broadland concerns. Now reads 'that introduces a more vulnerable use' to. Also River Bure, not Bure River.

<p>SB10 Broadland District Council 14</p>	<p>BUX 15 – Protecting and enhancing our valued water meadow landscape, p74</p> <p>The Water Meadows that are the subject of the Policy are not clearly defined on Map 16. This should be addressed so the boundaries of the areas to which the policy relates can easily be identified.</p> <p>Whilst the Council does not wish to comment further on the policy at this point it reserves the right to do so once clear mapping of the protected area is provided.</p>	<p>New watermeadows map added, sources referenced (NBIS, OS etc)</p>

	<p>It is not considered that 'a' is needed under para. 1, as there are no subsequent sub-paragraphs.</p>	
<p>SB10 Broadland District Council 15</p>	<p>BUX16: Local Green Spaces</p> <p>The Council was unable to locate the Buxton with Lamas parish Local Green Spaces report referred to in 5.16.2 of the Neighbourhood Plan. Therefore, it has been unable to establish whether it agreed with the LGS designations contained within the plan. It is important that all the policies of the plan are underpinned by relevant, adequate, proportionate and up-to-date evidence that justifies the policies concerned.</p>	<p>LGS assessment report has been undertaken and is available.</p>
<p>SB10 Broadland District Council 16</p>	<p>BUX17: Delivering sustainable design</p> <p>Point 2 of the policy refers to 'all proposals'. The subject of the policy appears however to relate to proposals that involve the erection of a new building, rebuilding or structural additions to a new building. This is as opposed to other development that might require planning permission, for example a change of use of land from agricultural to recreational open space that does not involve building operations.</p>	<p>Clause 1 has been amended to read: All proposals that</p> <p>involve the erection of a new building, rebuilding, residential conversion or structural alteration to an existing building” .</p> <p>In addition, Policy BUX 17, together with its supporting text has been updated to reflect up to</p>

	<p>The Council would recommend that the policy is made more precise in this regard, including consideration of whether it would be appropriate or reasonable to apply these requirements to all types of new buildings, which may include non-habitable buildings, which might require planning permission.</p>	<p>date best practice and the national priority for all new development to achieve zero carbon by 2050. The changes are in line with the changes proposed to the Greater Norwich Local Plan as part of its examination in 2023</p>
<p>SB10 Broadland District Council 17</p>	<p>BUX18: Facilitating low carbon living</p> <p>The Council notes that guideline distances are included as part of the supporting text to the policy rather than within the policy itself and indeed the document from which these are taken makes clear that its content is intended to be guidelines rather than standards.</p> <p>Whilst that Council does not intend to make specific comments on the policy it would note that the NPPF recognises that, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	<p>Policy BUX 18 Low Carbon Living has been removed mainly as the matters are covered elsewhere. Charging facilities for cars are required as part of Building Regulations Part S and broadband connectivity is dealt with in Building Regulations Part R. Clause 1b) has been subsumed into Policy BUX1.</p>

	<p>As such, in the identification of development sites and guidance around walking distances will need to be balanced against the opportunities that exist to plan for new homes that can help maintain and enhance the vitality of rural communities, recognising the development in one village may support the services in a village nearby.</p> <p>Such considerations will need to be balanced in both plan making and decision-making activities.</p>	
<p>SB10 Broadland District Council 18</p>	<p>BUX 19 - Protecting and enhancing the provision and quality of rural routes for non-motorised users in the parish, p82</p> <p>For the sake of clarity, points 2 and 3 should refer to development proposals as is done for point 4.</p> <p>Part 4 of this policy seems a little overly restrictive. Commonly, PROWs run alongside or within settlements and so do not always enjoy an open setting. Although examples have</p>	<p>BUX 19 Clause 2 and Clause 3: “proposal” amended to “development proposal”. Clause 4 of the policy, change to “public enjoyment of the network (this will depend on site context, eg....)”</p>

	<p>been provided, it will not always be clear to a decision maker whether or not a proposal will impact on the 'enjoyment' of the network.</p>	
<p>SB10 Broadland District Council 19a</p>	<p>BUX20 – Quiet Lanes, p84</p> <p>'Quiet Lanes' are those that have been designated as such by a local authority, where they meet certain criteria. The Council note that Quiet Lane status for these routes is an aspiration of the Plan (p96). However, as yet, this status remains to be achieved. As such, it is felt that the policy title is slightly misleading. For the sake of clarity, it would be beneficial if the features identified in the policy were specifically identified on a policies map.</p>	<p>Policy title and 5.20.2: "quiet lanes" amended to "rural lanes". Photos to be added Additional paragraph providing context regarding Quiet Lanes designation and reference to 6.7.1 inserted</p>

[SB10](#)
[Broadland District Council](#)
[19b](#)

BUX20 – Quiet Lanes, p84

The Council notes that 4 routes are identified under 5.20.1 but only 3 are included within the policy. It is unclear whether two of the routes have been aggregated for the purposes of the policy, if one route was omitted by mistake or if a route should have been excluded from the supporting text.

The Council is unclear on what is meant by the second bullet point under point 2. Neither Back Lane nor Sandy Lane appear to have any prioritisation for non- motorised users. It appears open to all modes of traffic. The Council would welcome clarification on what is intended by the policy.

Para 5.20.1, p83

Little Hautbois Road is not shown on the Map, nor included in Policy BUX 20. Also, it is not certain, if current situation is that non-motorised users are prioritised, as implied by the policy wording

Omission corrected - 4th route added to policy and map. BUX 20 Clause 2 second bullet point amended to: **“access for non-motorised users to rural routes is prioritised over other users”**

<p>SB10 Broadland District Council 20a</p>	<p>BUX21 - Maintaining and creating well-connected neighbourhoods, p85</p> <p>Para. 1 – requiring ‘all’ development proposals to provide walking and cycling routes is not considered proportionate. It would not be viable or justified for a proposal involving a porch extension (for example) to contribute to the walking/cycling network.</p> <p>In Para 1, is the requirement here for adequate pavement ‘condition’ or pavement ‘provision’? The Council would suggest changing “(including adequate pavement condition)” to “(including adequate pavement or footpath provision)” as some roads may be shared surfaces and not require pavements, for example.</p>	<p>BUX 21 Clause 1 amended to: “The design and layout of all development proposals will be expected to provide, wherever applicable, for direct, safe and attractive walking and cycling routes (including adequate pavement or footpath provisioncondition) within the scheme and utilise opportunities to link directly with neighbouring areas and village shops and services.”</p>
<p>SB10 Broadland District Council 20b</p>	<p>BUX21 - Maintaining and creating well-connected neighbourhoods, p85</p> <p>In para 2, too much permeability can raise a ‘Secure by Design’ issue. This wording could also include “well overlooked with active frontage”, as simply stating “safe” can relate to various issues such as separation from vehicles, for example, and not necessarily a feeling of safety for potentially vulnerable people using pedestrian</p>	<p>BUX 21 Clause 2 amended to: “Where a development scheme involves the creation of new streets or roads, the routes should be laid out in a permeable pattern. Cul-de-sac development will only be acceptable where it is short and, wherever possible, provides onward safe and secure pedestrian links that are well overlooked with an active frontage”</p>

	<p>connections. The Council note that this has been changed in the Design Guide but not updated here in the policy.</p>	
<p>SB10 Broadland District Council 21a</p>	<p>BUX22 - Managing and mitigating adverse impacts of</p> <p>The Council is unclear in terms of what point 1 of the policy expects in terms of assessment. The Council is increased traffic movements on the parish environment, P86 concerned that it would be reasonable or proportionate for all development proposals i.e., any development that requires planning permission to undertake extensive assessment of their impact upon highways where significant adverse impacts were unlikely.</p> <p>The Council would therefore recommend that the first point is amended such that it applies only to development proposals that are likely to result in a significant impact on the highway network.</p>	<p>The policy requires the impact of all development proposals to be considered when it comes to road safety. Where there is no relationship between a scheme and road safety then this will not need to be assessed.</p>

[SB10](#)
[Broadland District Council](#)
[21b](#)

BUX22 - Managing and mitigating adverse impacts of

In regard to point 2, the Council notes that the NPPF sets out at paragraph 110 that in assessing applications for development it should be ensured that any significant impacts from the development on the transport network can be mitigated to an acceptable degree.

In addition, paragraph 111, the development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The policy points only to adverse impacts. This appears to apply a lower threshold than is set out in the NPPF. If the plan intends to exceed the requirements of the NPPF then clear justification should be set out. The Council document was not able to identify such justification.

Clause 1 now to read... All development proposals in the plan area will be considered in light of their impact on road safety for all users, especially non-motorised users such as pedestrians, users of mobility scooters, cyclists and horse riders.

Clause 2 to read Where proposals will have an unacceptable impact on road safety, or are likely to have a significant impact on residential amenity, they will be expected to be assessed, and expected to address and mitigate their impact by providing or contributing to road safety or street scene enhancement measures. Such measures must directly address the adverse impacts.

[SB10](#)
[Broadland District Council](#)
[21c](#)

BUX22 - Managing and mitigating adverse impacts of

In regard to point 3, it was unclear how impact on amenity was to be judged and whether it added anything to the protections sought under policy BUX5. The plan should avoid unnecessary duplication. Consideration should be given to the policy in this regard.

The Council also notes that the policy defines an unacceptable impact in respect of the routing of HGV traffic on C road. This appears to be based on the statement asserted in 5.22.4. The Council was unable to identify other evidence about C road within the Neighbourhood Plan area. As such the Council is concerned that this element of the policy is not supported by the proportionate evidence needed to justify such a policy, and as such fails to meet the basic conditions.

As there is only one bullet point under part 3 of the policy, it is felt this statement (regarding the routing of HGV traffic) can be included within the body of part 3.

BUX 22 clause 3 amended to: **“Proposals likely to have residual (following mitigation measures) unacceptable impacts on road safety and residential amenity (see also Policy BUX 5), through traffic generation, will not be supported. Unacceptable impacts include: the routing of HGV traffic along inappropriate the rural roads (C roads) in the parish and through the settlements.”** 5.22.3 amended to **“In June 2021 consent was granted by Norfolk County Council (the Minerals and Waste Planning Authority) for the extension of the existing quarry to extract 1.45 million tonnes of sand and gravel and the importation of inert materials for restoration and recycling (FUL/2019/0043). As part of this consent, a routing strategy was conditioned that would result in HGV traffic not being directed along the village roads (e.g. Sandy Lane), or through Buxton village. The permitted access to Mayton Wood Quarry is on to the C494 Coltishall Road.** 5.22.4 amended to **“Any development which results in an inappropriate traffic burden along**

		<p>the rural roads (C roads) and through the settlements in the parish will be resisted”</p>
--	--	---

[SB10](#)
[Broadland District Council](#)
[22](#)

BUX23: Support for rural businesses, P88

Part 1b – The term ‘adequate’ does not bring the necessary clarity required for decision making and this will vary depending on the type of business and its needs. For the type of small business development that would be considered appropriate in a small rural community such as this, is it reasonable to specify a requirement for visitor and delivery parking in every instance? The Council would suggest including ‘wherever possible’ at the end of the sentence.

Also, there is no need for ‘where’ at the start of the sentence as the first para finishes with ‘where’ before the list.

The Council notes reference to Policy BUX1 on which the Council has provided separate comments. Those comments should thus be, as relevant, read in connection with this policy.

BUX 23 1b amended to: **“they are provided with adequate off-street parking to that meet the needs of the development wherever possible. Where on-street parking is unavoidable, to meet the needs of visitors and delivery requirements of the business, to be acceptable this must be designed to avoid impeding the flow of pedestrians, cyclists and other non-motorised users and not compromise the safety of all road users. (including visitor parking and delivery requirements of the business) and do not trigger or contribute to problems associated with onstreet parking”**

<p>SB10 Broadland District Council 23a</p>	<p>BUX24: Bure Valley Business Centre, p90</p> <p>In principle, the Council supports the retention of rural employment areas as a key part of supporting a prosperous rural economy.</p> <p>The Council is unclear what a creative development proposal, as opposed to just a development proposal that meets the terms of the policy is. The Council would suggest that elements of point 1 may be better included in supporting text with the policy wording along the following lines, “The site of the Bure Valley Business Centre should be primarily retained for employment uses. The redevelopment of the site for the following uses will be viewed favourably: ..”</p>	<p>Policy has been amended in light of these comments and taking on board follow on discussions with officers in October 2023</p>
<p>SB10 Broadland District Council 23b</p>	<p>BUX24: Bure Valley Business Centre, p903c – The current buildings on the site are single storey. Those at back of the site are visible from the street and not screened. The Council therefore do not feel it is correct to state that the current scheme visually screens buildings from the Street.</p>	<p>This is accepted. the clause has been amended to say the proposal takes the elevated position of the site, relative to The Street into account and continues to be sympathetic to the ..</p>

SB10 Broadland District Council 23c	<p>BUX24: Bure Valley Business Centre, p90</p> <p>3d – This would seem to be overly restrictive in terms of hindering any future re-development. Is this achievable?</p>	<p>Clause 3d removed as it is now integrated with Clause 3c</p>
SB10 Broadland District Council 23d	<p>BUX24: Bure Valley Business Centre, p90</p> <p>3e – ‘Proposals that would result in additional surface water run-off into the water meadows will not be supported unless risk of contamination from the site can be ruled out.’ – the starting point here should surely be that proposals will be acceptable where they do not exacerbate surface water run-off into the water meadows and should provide</p>	<p>Comment is accepted. the clause now focuses on ensuring surface water run off is managed in line with Policy BUX 14</p>

	<p>appropriate on- site sustainable drainage solutions? No surface water discharge should be contaminated, in any case.</p>	
<p>SB10 Broadland District Council 23e</p>	<p>BUX24: Bure Valley Business Centre, p90</p> <p>Point 4 appears to contain uses that would be viewed favourably. Could this point therefore be aggregated into the other favourably viewed uses in point 1? Also, note that in referring to Classes rather than more specific uses may limit the longevity of the policy if Classes change again within the Plan period.</p>	<p>This comment is accepted. Clause 1 has been reworded to address this</p>

<p>SB10 Broadland District Council 23f</p>	<p>BUX24: Bure Valley Business Centre, p90</p> <p>5b – It is not clear what ‘deliver overall benefits to the community’ means and how this would be measured.</p>	<p>Expand 4b to be more helpful to planners: 4b) it helps to meet the policy objectives of this plan and deliver overall benefits to the community (for example, affordable housing to meet the needs in the community, local employment opportunities, provision of local services, renewable energy infrastructure that can help lower the carbon footprint of the parish).</p>
<p>SB10 Broadland District Council 23g</p>	<p>BUX24: Bure Valley Business Centre, p90</p> <p>6 – The Council would question the appropriateness of criteria 6. This appears to add an additional layer of statutory engagement into the planning application process, which is not normally within the remit of a land use policy.</p> <p>In the view of the Council any development of the type envisaged for this site should be judged on its planning merits. The development of the Neighbourhood Plan, which will be subject to referendum, provides the opportunity for the community to establish policy requirements related to the development of the site. If the steering group wish to</p>	<p>Rewrite clause 5: Due to the sensitivity of this site, comprehensive redevelopment schemes or schemes that include residential development, will be informed by meaningful pre-application community engagement, demonstrated through the submission of a community</p>

	<p>encourage pre- application community engagement, this aspiration could be moved into the supporting text.</p>	<p>engagement statement, detailing the pre-application engagement activity with the community and wider stakeholders.</p>
<p>SB10 Broadland District Council 24</p>	<p>Section 6 - Community projects which fall outside the scope of this plan</p> <p>The Council commends the inclusion of such a comprehensive and well-considered series of community projects/aspirations, as part of the document. The Council consider it might be helpful to encapsulate these projects in a tabular action plan, for ease of reference – whether as a separate document or appendix to the plan.</p>	<p>This will be raised with the parish council as a task to complete after the NP is made.</p>
<p>SB10 Broadland District Council 25</p>	<p>Section 7 – Monitoring and delivery</p> <p>The Council would recommend that detail is set out within the plan in respect of the how the Parish Council intends to monitor the plan, and how and when such monitoring outputs will be published.</p>	

	<p>It is also felt it would be useful to reference here some of the other potential triggers that could lead to the need for a Neighbourhood Plan review. For example, the fact that Local Plans are required to be reviewed every five years and that this may flag the need for a review of NP policies. In addition, there are planning reforms at a national level that are expected to be announced through the Levelling Up Bill later in the year. These will no doubt have an impact on the future of neighbourhood planning.</p>	
<p>SB10 Broadland District Council 26</p>	<p>Appendix 4</p> <p>This needs checking/refreshing, in light of comments about 'important' hedgerows (above).</p> <p>Secondly, some of the listed trees are incorrectly identified. For example, it is understood that the large tree within the Churchyard at Buxton is a Sycamore, not a Plane, and that the tree by the mill stone is definitely not an oak. The trees at Crown Road/Church Close entrance are Norway maples, rather than our native field maple. Also, it might be worth having clearer criteria for this list as, again, it could be argued to be subjective. Why, for example, are the cherries in Church Close included, but the hornbeams at the village hall play area, along Coltishall Road, not? Young trees that are established and growing independently should be valued, too.</p>	<p>Appendix 4 has been revised.</p>

[SB10](#)
[Broadland District Council](#)
[27](#)

Design Guide

A number of comments were submitted to the group specifically on the design guide in January 2023.

Whilst some of these have been incorporated, there are still some that remain as follows;

Materials

Previous comment: ‘

Through the document it is not too clear what are the traditional or vernacular materials and therefore unclear guidance for new builders to know what to source and replicate. On P33 “Brown brick” is referred to – does this mean London Heathers? – this is not a vernacular or traditional brick for the area – however where houses are built of this then extensions etc could be specified – however it is not the ideal brick for new builds. CA1 - BF07 on p108 states developments must always use traditional materials – but there is no differentiation in the assessment between what should be considered vernacular materials i.e., red brick, clay pantiles, limited buff brick, dark pantiles and use of course/knapped flint. Clay pantiles are also the traditional vernacular roofing material

A number of amendments have been made to the Design Guidance and Codes, some in light of these comments

rather than concrete pin tiles? P41 – flint pebble – where? It seems mainly knapped flint or flint rubble.'

The reference to brown bricks has stayed. There is still concern about flint pebble as this is mainly found in coastal areas and very rarely used more inland although there is the odd C19 case. It would be better if flint was described as a limited material.

Previous comment:

'P12 – states that the Mill was “rebuilt” in 1991 – this gives the impression that a significant amount was destroyed however quite a lot is original and it was mainly the timber framing sections that were rebuilt - I would suggest perhaps ‘required partial rebuilding’ or ‘restored’ perhaps?

Because the mill is listed it is important to appreciate that there is still quite a lot of original fabric.'

This has been changed, although the wording does not sound quite right “It was originally built in the late 18th century and was required partial rebuilding after a fire in 1991.” – “was” needs deleting.

Previous comment: ‘

P85 Should encourage clay pantiles rather than concrete tiles and slates which are not traditional/vernacular or less common.’

**This has been changed. It could still mention use of slate in some circumstances.
(There is a picture on p86)**

P91-92 – It would be good to have a paragraph saying special requirements may be needed for traditionally constructed historic buildings.

[SB10](#)
[Broadlan](#)
[d District](#)
[Council](#)
[FULL](#)

General The documents have a number of accessibility issues, mainly related to alternate text, which will need to be addressed before the Council can accept these at the submission stage. All of the documents need to meet the Web Content Accessibility Guidelines (WCAG) 2.1, in order for us to upload these to the Council website at the submission stage. This legislation also applies to the Parish Council. The Council would be happy to discuss this with the steering group, if needs be.

Where a policy only includes one paragraph, the Council would recommend against numbering, as it implies that there should be further policy paragraphs. E.g., Policy BUX 7 and Policy BUX 8 – remove the figure ‘1’.

Para 1.1.1, p7 The Council does not consider that the final sentence of paragraph 1.1.1 accurately portrays the status of the Neighbourhood Plan in the decision-making process.

As set out in paragraph 006 of the Planning Practice Guidance on Neighbourhood Plans, Planning law requires decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.

<p>SB11 Norfolk County Council (1. General)</p>	<p>Norfolk County Council Comments on the: Neighbourhood Plan (Reg 14)</p> <p>23 June 2023</p> <p>1.</p> <p>Preface</p> <p>1. The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of the emerging Neighbourhood Plan.</p> <p>2. 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.</p>	<p>Noted with thanks.</p>
<p>SB11 Norfolk County Council (2. Natural)</p>	<p>3.10.4:</p> <p>Whilst increased recreational pressure is known to cause harm to the natural environment, wild swimming is not considered to be a particularly appropriate example here as it is not known to result in any such harm. Instead dog walking (dogs off leads</p>	<p>3.10.4 reference to wild swimming removed, and reference to uncontrolled dogs inserted.</p>

Environm ent) 01	<p>disturbing ground nesting birds etc), littering and campfires/ barbeques are considered more likely to cause such harm and may therefore be more suitable examples to refer to.</p>	
SB11 Norfolk County Council (2. Natural Environm ent) 02	<p>Vision, Themes and Objectives:</p> <p>Theme 4 and Objectives 6,7 and 8 are supported from an ecological perspective.</p> <p>Theme 3 and 4 are supported from a landscape and visual perspective.</p>	<p>Noted with thanks.</p>
SB11 Norfolk County Council (2. Natural	<p>Policy BUX 12:</p> <p>Protecting sites of existing biodiversity value: The policy is supported, and the Natural Environment team are pleased to note those sites and features of biodiversity value have been identified.</p>	<p>Noted with thanks.</p>

Environm ent) 03		
SB11 Norfolk County Council (2. Natural Environm ent) 04	<p>Policy BUX 13:</p> <p>Delivering Biodiversity Net Gain: The policy is supported.</p> <p>It is advised that section 5.13.6 is updated to reference the current Biodiversity Metric Version 4.0 which has replaced V3.1.</p>	<p>5.13.6 updated to reference the current Biodiversity Metric Version 4.0.</p>
SB11 Norfolk County Council (2. Natural Environm ent) 05	<p>Policy BUX 1:</p> <p>Support is given for maintaining settlement boundaries for most residential development and suitable development outside of these boundaries. This should help to prevent unwanted coalescence between settlements. This is further strengthened by BUX 9 which is also supported.</p>	<p>Noted with thanks.</p>

<p>SB11 Norfolk County Council (2. Natural Environm ent) 06</p>	<p>Policy BUX 4:</p> <p>Support is given to the importance of retaining local character and distinctiveness through design, massing and form of development.</p>	<p>Noted with thanks.</p>
<p>SB11 Norfolk County Council (2. Natural Environm ent) 07</p>	<p>Policy BUX 6:</p> <p>Support is given for this well worded policy to help protect and enhance the landscape character of the area.</p>	<p>Noted with thanks.</p>
<p>SB11 Norfolk County Council (2.</p>	<p>Policy BUX 7:</p> <p>Support is given for ensuring that development density is maintained at appropriate levels for the settlement pattern and surrounding landscape. This is especially important</p>	<p>Noted with thanks.</p>

Natural Environment) 08	<p>when the development land in question, in this case residential gardens, can form a vital part of the wider green infrastructure of the area.</p>	
SB11 Norfolk County Council (2. Natural Environment) 09	<p>Policy BUX 8:</p> <p>The Natural Environment team support the inclusion of Priority Views and Locally Iconic Views and their protection through this policy.</p>	<p>Noted with thanks.</p>
SB11 Norfolk County Council (2. Natural Environment) 10	<p>Policy BUX 9:</p> <p>(See Comments under BUX 1).</p>	<p>Noted with thanks - for reference, comments under BUX 1 read as follows: “Support is given for maintaining settlement boundaries for most residential development and suitable development outside of these boundaries. This should help to prevent unwanted coalescence between settlements. This is further</p>

		strengthened by BUX 9 which is also supported.”
SB11 Norfolk County Council (2. Natural Environment) 11	<p>Policy BUX 10:</p> <p>The recognition and protection of Dark Skies is supported and the Natural Environment team support ideas such as minimised, timed and angled lighting.</p>	
SB11 Norfolk County Council (2. Natural Environment) 12	<p>Policy BUX 15:</p> <p>It is encouraging to see this policy to protect and enhance a unique landscape in the parish and Natural Environment team support the inclusion of this well worded policy.</p>	Noted with thanks.

[SB11](#)
[Norfolk](#)
[County](#)
[Council](#)
[\(2.](#)
[Natural](#)
[Environm](#)
[ent\)](#)
[FULL](#)

2. Natural Environment

1.

1.

Ecology:

2. 3.10 Environmental Issues:

3. 3.10.4:

Whilst increased recreational pressure is known to cause harm to the natural environment, wild swimming is not considered to be a particularly appropriate example here as it is not known to result in any such harm. Instead dog walking (dogs off leads disturbing ground nesting birds etc), littering and campfires/ barbeques are considered more likely to cause such harm and may therefore be more suitable examples to refer to.

4. Vision, Themes and Objectives:

5. Theme 4 and Objectives 6,7 and 8 are supported from an ecological perspective.

6. Policy BUX 12:

Protecting sites of existing biodiversity value: The policy is supported, and the Natural Environment team are pleased to note those sites and features of biodiversity value have been identified.

7. Policy BUX 13:

Delivering Biodiversity Net Gain: The policy is supported.

8. It is advised that section 5.13.6 is updated to reference the current Biodiversity Metric Version 4.0 which has replaced V3.1.

9. Landscape:

10. Vision, Themes and Objectives:

11. Theme 3 and 4 are supported from a landscape and visual perspective.

12. Policy BUX 1:

Support is given for maintaining settlement boundaries for most residential development and suitable development outside of these boundaries. This should help to prevent unwanted coalescence between settlements. This is further strengthened by BUX 9 which is also supported.

13. Policy BUX 4:

Support is given to the importance of retaining local character and distinctiveness through design, massing and form of development.

14. Policy BUX 6:

Support is given for this well worded policy to help protect and enhance the landscape character of the area.

15. Policy BUX 7:

Support is given for ensuring that development density is maintained at appropriate levels for the settlement pattern and surrounding landscape. This is especially important when the development land in question, in this case residential gardens, can form a vital part of the wider green infrastructure of the area.

16. Policy BUX 8:

The Natural Environment team support the inclusion of Priority Views and Locally Iconic Views and their protection through this policy.

17. Policy BUX 9:

(See Comments under BUX 1).

18. Policy BUX 10:

The recognition and protection of Dark Skies is supported and the Natural Environment team support ideas such as minimised, timed and angled lighting.

19. Policy BUX 15:

It is encouraging to see this policy to protect and enhance a unique landscape in the parish and Natural Environment team support the inclusion of this well worded policy.

20.

Should you have any queries with the above comments please contact the Natural Environment Team at neti@norfolk.gov.uk.

<p>SB11 Norfolk County Council (3. Historic Environm ent Officer)</p>	<p>3. Historic Environment</p> <p>From the point of view of the historic environment we offer the following advice:</p> <p>That Historic England's published guidance on the preparation of Neighbourhood Plans should be consulted (https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)</p> <p>It encourages the full consideration of heritage assets and suggests ways with which this can be achieved. Based on this guidance, we would like to suggest the authors of the plan follow a number of steps:</p> <ol style="list-style-type: none">1. Study Historic England's published guidance and consider how the plan can take its advice on board.2. Contact the Norfolk Historic Environment Record (NHER) and request information on	<p>The list of NDHA has been reviewed following Reg 14; some archaeological sites and other assets within the Norfolk HER have been reviewed and some included. More information is provided in the appendix.</p>
---	---	---

designated and undesignated heritage assets within the plan area. The NHER can be contacted

at heritage@norfolk.gov.uk.

3. Consider the full range of heritage assets within the plan area and identify those they feel are

most significant. They may wish to prepare a local list of heritage assets they believe should be

protected and enhanced and put this to the community for consideration.

4. Directly consult the Historic Environment Service's planning advice team (hep@norfolk.gov.uk),

who can provide advice on which heritage assets are most significant and ways in which they

can be protected and enhanced. They can also offer advice on the wording of historic environment policies.

It is notable that your present draft barely mentions buried archaeological remains, concentrating standing buildings. Furthermore the Second World War assets at the mill, the Roman road and the Bure Navigation are historic environment assets.

Furthermore, you may wish to include a statement defining the role of our team in advising the local planning authority on the historic environment impacts of planning applications and any on any mitigation which may be necessary.

[SB11](#)
[Norfolk](#)
[County](#)
[Council](#)
[\(4. Lead](#)
[Local](#)
[Flood](#)
[Authority\)](#)

4. Lead Local Flood Authority

1. The LLFA comments at Regulation 14 stage are as follows:

2. The LLFA welcome that there is reference made in the Draft Neighbourhood Plan and its proposed policies to flooding from sources such as surface water, rivers (fluvial from the River Bure and its tributaries), as well as the need to

protect the environment and consider the impacts of climate change. It is however noted that no reference is made to groundwater flooding within the document. Of the 25 no.

proposed policies, Policy BUX 12: Protecting Sites of Existing Biodiversity Value, Policy BUX 13: Delivering Biodiversity Net Gain and biodiversity enhancements, Policy BUX 14: Protecting water quality and managing surface water responsibly, Policy BUX 15: Protecting and enhancing our valued water meadow landscape, Policy BUX 16: Local Green Spaces and Policy BUX 17: Delivering Sustainable Development and their supporting text, along with Community Project 3: Sustainable Drainage and Community Project 7: Maintenance of the Bure Valley Railway, Objectives 6,7 and 8 and Maps 5, 6, 7, 15, 16 and 17, are of the most relevance to matters for consideration by the LLFA.

3. The LLFA further welcome that the Neighbourhood Plan acknowledges that it plays as an important role in highlighting parish-level flood risk, protecting landscape features (including the water meadows which have an important role in managing flood risk), ensuring flood risk is not increased as a result of any new development, contributing to

The 4 pillars of SUDs are referred to in Policy BUX 14. The PC has secured funding for the undertaking of a parish specific flood risk study that will cover all sources of flooding. the NP has been amended to refer to extent of ground water flood risk in the parish. Changes have been made to the Key Issues Chapter, the maps and the policy section to ensure full coverage of flood risk matters in ther. Regarding the DG5 Register, the Greater Norwich Area Strategic Flood Risk Assessment notes that two sewer flood incidents on Anglian Water's DG5 register.

[SB11](#)

[Norfolk](#)

[County](#)

[Council](#)

[\(5. Public](#)

[Health\)](#)

5. Public Health

1. Neighbourhood Plans play an important role in the considerations of the built environment and can positively influence health and wellbeing of residents. Good health includes physical, social, and mental wellbeing.

2. Neighbourhood Plans should support healthy behaviours and aim to reduce health inequalities; therefore, they could consider:

- Quality and affordable housing: associated with improved quality of life, mental health, and clinical health-related outcomes
- Improved transport and accessibility: increased social connections and encouragement to walk and cycle
- Social infrastructure provisions: enable residents to have good access to service and opportunities for social interaction and sense of community

Factors listed here have all been considered and are covered by our policies and narratives throughout.

- Economic activity: a range of employment opportunities within the neighbourhood or accessible by sustainable travel
- Natural environment: access to high quality green space can increase physical activity, provide opportunity for local food growing, address air quality issues and contribute to nature conservation and biodiversity
- Climate resilience: address warm summers and cold winters. Build resilience into the community, for example flood risk mitigation
- Health inequalities: specific consideration of vulnerable groups, for example elderly people or deprived areas

3. Reference to health could be included throughout the Neighbourhood Plan or the health elements can be drawn together into one section within the plan to be easily accessible and show full consideration of health.

4.

Should you have any queries with the above comments please contact the Public Health at phplanning@norfolk.gov.uk

[SB11](#)
[Norfolk](#)
[County](#)
[Council](#)
[\(6.](#)
[Minerals](#)
[and](#)
[Waste\)](#)

6. Minerals and Waste

1. Norfolk County Council, as the Mineral and Waste Planning Authority, has the following comments to make on the Buxton with Lammas Neighbourhood Plan:

2. We object to the wording of point 3 of Policy BUX 22: 'Managing and Mitigating the adverse impacts of increased traffic movements on the parish environment'. We recognise that local residents are concerned about the potential for HGVs to use Sandy Lane. However, the planning permission for Mayton Wood Quarry (FUL/2019/0043) contains a planning condition which requires the development to only operate in accordance with the agreed routing strategy, which does not allow HGVs to use Sandy Lane. This is recognised in paragraph 5.22.3 of the Neighbourhood Plan.

Mayton Wood Quarry is safeguarded under the existing policy CS16 of the adopted Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD, which is in accordance with paragraph 210 of the NPPF.

The new permitted access to Mayton Wood Quarry is on to the C494 Coltishall Road. Therefore, the current wording of point 3 of Policy BUX 22 is not appropriate as it is not possible for vehicles to access Mayton Wood Quarry without using a C road.

5.22.3 Planning reference (FUL/2019/0043) inserted and permitted access specified.

Therefore, the wording of point 3 of Policy BUX 22 should be amended to delete the reference to 'C roads' and to insert 'inappropriate' so that the sentence would read:
"Unacceptable impacts include: the routing of HGV traffic along inappropriate rural roads in the parish and through settlements".

Norfolk County Council, as the Highway Authority, are best placed to determine what an unacceptable impact on the highway network would be.

3.

Should you have any queries with the above comments please contact Caroline Jeffery (Principal Planner, Minerals and Waste Policy) at caroline.jeffery@norfolk.gov.uk

<p>SB12 Norfolk Rivers Drainage Board</p>	<p>28 Horsley's Fields KING'S LYNN</p> <p>Norfolk PE30 5DD</p> <p>01553 819600</p> <p>planning@wlma.org.uk</p>	<p>A new section added after current paragraph 5.14.8</p> <p>Land drainage consents:</p> <p>All proposals involving discharge into our watercourses must secure any required consents from the applicable environmental body e.g., the Environment Agency or the Internal Drainage Board.</p> <p>The parish falls partially within the Internal Drainage District (IDD) of the Norfolk Rivers Drainage Board (IDB). (INSERT LINK TO THE PDF MAP HERE</p> <p>https://www.wlma.org.uk/uploads/NRIDB_082G_BuxtonHevinghamE.pdf</p>
---	--	---

[School Council, Buxton Primary School](#)

Issues: people don't slow down, Aylsham to Buxton road the sign says 50 but they do more. There is a lack of parking especially round the school. Cars park on the green verges especially up stacey road and its difficult to walk on the paths. Too much litter, in the forest and near houses, Too much dog poo especially along stacey road. Holes in the road are dangerous for bikes.

We need more signs or more people to be fined if they leave their dog poo and do not clear it up.

We need to ride bikes more in the village, cars don't help the environment, cars should only be used for going long distances. Add bike paths

Re-use materials for building houses

School fields should be protected for school use only, no development allowed unless the school needs more buildings. Its really important for us (children) to have the playing fields

To control speeding cars we need to add signs, its hard to cross at the school, the speed limits need to be reduced to 20 mph., signs can be distracting, but we can hand out flyers asking people to slow down. Signs could be made by reception classes. Bigger signs would mean people can see them more clearly. If the children were to hold the signs asking drivers to slow down this might make a difference and increase awareness

Improving parking - maybe allocate parking in the village hall car park, just for teachers or children that come a long way. We could have a limited parking zone for the school,

Thank you to the children and school for valuable input. The Dell has been included as a Local Green Space but the school fields are not, as it is felt they are adequately protected and it is a different type of open space, associated with the school. These comments are also passed to the Parish Council for their information.

where the cars are parked (like in Balay park) then parents and children can walk from there. There is heavy traffic around the school, especially when the buses come.

Need to cover the holes in the road so that the bikes do not get stuck in them or have accidents.

We should not cut down trees, we should use them only when they fall over. We should not use living trees. We need to replant trees if we do have to cut them so we have the same number of trees or more. The Dell is an important place for us, for wild animals, we need to protect it.

If we are building on farmland we need to make sure we still have space to grow food. This should only be allowed after we look at how much use the fields have.

We need more spaces for camping

There needs to be regular litter picks.

Untitled		
--------------------------	--	--