Corpusty and Saxthorpe Neighbourhood Plan.

Pre submission consultation, 5th June- 17th July 2017

Thank you for the opportunity to comment on the emerging Neighbourhood Plan. The council have previously provided detailed comments on emerging versions covering the structure of the document and specific policy areas and provided financial support and ultimately undertaken a number of individual workshop/review sessions with the Neighbourhood Plan group on the emerging consultation document. The attached schedule forms the Council's formal comments on the emerging neighbourhood plan at regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012. It is at this stage where there is an opportunity for statutory bodies, residents of the Neighbourhood Plan Area and those that have an interest in the Neighbourhood Plan to submit formal comments on the Pre Submission Draft Plan.

The comments were discussed at the Planning Policy and Built Heritage Working Party held on the 19th June and subsequently ratified by the Cabinet through delegated authority of the Leader.

Summary

The production of the Neighbourhood Plan is to be broadly welcomed on the basis that is to bring more local land use matters into consideration in the determination of any planning applications and has undoubtedly raised awareness on the importance of the built environment within the parish. It is recognised that considerable time has been spent in the production of this emerging plan mainly by a limited number of volunteers with limited planning knowledge.

The plan seeks to provide an extensive framework over a number of key objectives and as ever with such a broad approach runs the risk of general conformity issues with the adopted Local Plan of the Council, along with potential overlap with the emerging Local Plan. In order to remain effective and useful in the determination of applications it is recommended that wherever possible neighbourhood plans are kept as simple and focused as possible. **Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan**. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area as long as they do not seek to duplicate existing non-strategic process and policies. Any repetition of national and local policies should therefore be removed.

Although considerable efforts have been made through ongoing dialogue there remain a number of areas of concern, specifically that there are areas that may not be totally justified through evidence or be in conformity with the Local plan and legislative process. It is recognised that at this stage the inclusion of such matters may be in response to community aspirations, but never the less going forward they will have to be addressed. Following the

regulation 14 consultation there is an opportunity for the neighbourhood Plan group to review and adjust the plan and the opportunity to document specific evidence before submission to the council under regulation 15 &16. It is at this stage that the Council will review the Draft Neighbourhood Plan and submission documentation for conformity to the entire legal framework.

Comments at this stage are intended to be specific to the overall emerging plan and each policy area. The comments summarised in the attached schedule have been collated from across relevant departments and are intended to be informative and constructive to aid the formation of a sound document and the effective formation of and use of policies and complement the wider existing and emerging Development Plan Framework.

Next stages

Following the pre submission stage the emerging Neighbourhood Plan should be reviewed and updated to form the proposed Neighbourhood Plan. A schedule of comments is required in order to summaries the comments received and show how all the comments have been used to inform the preparation of the plan. It is this schedule that will form part of your consultation statement and help demonstrate how the plan was been informed by the consultation. An example of how this could be laid out has previously been sent via e mail on the 26.06.17

Upon submission the proposed plan is required to be accompanied by a number of legislative documents:

- A map which identifies the proposed Neighbourhood Area;
- A consultation Statement -detailing the details of people and organisations consulted, how they were consulted, a summary of the main issues and concerns raised through the consultation process and descriptions of how these were considered and addressed in the proposed Neighbourhood Plan;
- A basic Conditions Statement - a statement that explains how the plan has had appropriate guard to national policy, how it contributes to the achievement of sustainable development, how it is in general conformity with the strategic policies in the development plan for the local area and how the plan is compatible with EU obligations, including human rights requirements;

To aid this process the Council has undertaken a habitat scoping report on an emerging version and this will need to be reviewed against the final proposed plan by the neighbourhood group. In addition the Council is about to publish guidance notes which among other matters contain guidance around the conformity and the Basic Conditions tests. **This guidance contains the policies which the Council considers to be Strategic and which neighbourhood plans are required to be in general conformity with, forming one of the Basic Condition tests. A submission check sheet has also been written bringing**

together the legislative requirements around the submission of a neighbourhood plan. We would encourage the review of these guidance notes and check sheets. These will be made available shortly on the Planning Policy web pages of the Council's web site.

Following submission, the council will formally review the proposed plan and submission documents against the required Legal Framework. Once the council is satisfied that this has been followed it will then invoke regulation 16 which consists of publishing the proposed Neighbourhood Plan and seek representations on it from those who live, work or carry on business in the Neighbourhood Area. The Council will also at this period consider nominations and select an independent examiner.

Regulation 14 Corpusty and Saxthorpe Pre Submission Draft consultation

Schedule of Comments.

Consolidated Officers response - Build Heritage and Local Plan Working Party 19 June 2017.

	Page and Policy/ Paragraph No	Comment
1	General	Pleased to see that many of the detailed comments previously given around structure and policy content have now been taken on board. We recognise that it remains important to the NP group to reflect community aspirations however guidance is clear that Neighbourhood Plans do not seek to duplicate existing statutory and non-statutory policies or seek to introduce non land use planning matters. **The council advise that areas of duplication should be reviewed prior to submission**
2	General	We have previously commented re reference to evidence being included as appendices in the text and policy areas. At this stage as it is considered that it draws attention to these documents as part of the consultation. However going forward much of these evidence appendices will need to be separated out from the plan and be used to inform the basic conditions statements. Other supporting evidence should still be made publically available but sit separate from the plan. Where an appendix is intended to act as a guide, text in the NP should be amended to refer to the guide. All supporting documents need to be available on the Neighbourhood Plan web site.
3	General	Conformity – throughout the plan there are references to the Core Strategy, Local Plan and Development Plan of the district. The Neighbourhood Plan is being brought forward ahead of the emerging new Local Plan and although the dates now align, in order to future proof the NP it is recommended that consideration is given to amending text and in places policies so that the reference is to not only to the Core Strategy but its subsequent revision or simply the Development Plan. For example 4.1.1 (2) (f) the plan needs to be in general conformity with the existing strategic policies contained in development plan…….. Thus this plan is in accordance with the North Norfolk District Council Core Strategy…. ADD and *also has regard to the emerging Plan*.

		Policy H3 - referrers directly to Core Strategy Policy on mix of homes. This policy will be reviewed in the emerging Local Plan. In these circumstances consideration should be given to adding or *subsequent revision* or simply replace NNDC Core Strategy *with NNDC Development Plan*. These slight changes and consistency throughout the NP will help future proof the proposed NP when the local plan is adopted.
4	7.1	References to the village envelope need to be replaced with correct terminology – the settlement boundary.
5	7.1	General – the settlement boundary is a policy line that differentiates between policy approaches, proposals that are inside the boundary and those that are outside. The text should be changed to make clear that although the preference is for development to be inside the boundary development outside will be strictly controlled through policies contained in this neighbourhood plan and the districts' development plan – reference to not allowing development outside the boundary is an aspiration. Technically development outside the boundary is limited to that which is required for a rural location *outside Corpusty and Saxthorpe in conformity with Core Strategy policy SS2 and the text should be amended as such here and elsewhere in the NP for consistency.*
6	Overarching policy 1	It is taken that the enlarged settlement boundary is required in order to fulfil the aims/objectives of the plan and community aspirations however there should be clear justification for the preferred option and the rejection of alternative option b. An assessment based on a set of criteria would strengthen the proposed approach.
		4th bullet – delete. There is no need to reference in the policy that the site has been previously allocated.
		5th bullet – add **minimum of 0.15 hct** of open space – conformity with the development plan**.**
		5th and 6th bullet are site specific and could be combined into policy three – see notes below
6a	Priority Areas	Consideration could be given to referencing how many dwellings these priority areas could provide. it should not conflict with density requirements detailed separately in the plan
7	7.3 & overarching policy 3	NPPF encourages policies to make effective use of land by re using land that has been previously developed and in para 47 set out their own approach to housing density to reflect local circumstances. This is set in the context of "In order to boost significantly the supply of housing, national planning policy requires local planning authorities to set out their approach to housing density to reflect local circumstances. The district development plan policy Ho7 sets out the strategic approach to density and aligns with the NPPF and the NP should be seeking to be in general conformity with it. The NP correctly identifies that this is a requirement for 30 dph however the NP then seeks to change this policy to a lower threshold of 25. Our previous advice was that any policy wording should seek to align with the overarching policy context and be more general In addition it is taken that this policy is referring to priority sites 1, 2 and 3 rather than over all density. The title of the policy is misleading and should be changed to reflect development requirements of priority areas 1, 2 and 3. In addition and for simplicity this policy could be combined with overarching

		policy 1 and bullets 5 and 6 of policy 1 should be moved into this new policy – that way all the requirements of priority areas are in one place. Consider the below: New residential development should have a density that is consistent and compatible with the existing prevailing density in the immediate area in order to reflect the local character and appearance. Proposals should respond positively to the existing appearance and character of the immediate neighbouring residential architectural style and type. Buffer planting within defined residential development areas will be encouraged to address and reduce visual impact and landscape issues. Developers will be required to provide suitable public open spaces and provide public access through them. - Open space in site 1 should be provided in the north of the site, providing a minimum of 0.15 hts of public open space. - All hedgerows in sites 1 and 2 should be preserved or replaced by appropriate alternative planting
		Notwithstanding the above point 1 in policy 3 is not a policy but a definition this should be removed
		The remaining points 2 and 4 should be combined into a suitably worded policy as above In addition the supporting text in 7.3 talks about developments following "modern best practice". Whilst a laudable aim, it is considered that including references to the London Housing Design Guide and to the Parker Morris space standards will not be helpful going forward. The former, whilst containing 41 useful design standards, provides some quite prescriptive requirements which have clearly been heavily influenced by the higher density schemes of the capital. It is therefore questionable whether it really translates into a North Norfolk context, or indeed whether some of the more detailed guidance actually accords with our own amenity criteria and parking standards. If the standard was to be used, It is clearly incumbent on everyone to be familiar with their contents in any decision making. Given the current guide comes in at 171 pages; I'm not sure how realistic this would be in practice. Therefore, despite it offering some commendable direction for developers (particularly in urban areas), the council would question the credibility or influence of it within this district. The latter, meanwhile, whilst hugely influential back in the 1960/70s, dates from a time when development pressures and planning considerations were significantly different. With occupancy expectations having also changed considerably, it is doubtful whether the inclusion of this reference provides any real value. National policy is also clear that when there is a desire in setting local building standards that they are set in a consistent way with the **Governments policy and adopt nationally described space standards. (NPPF para 95).** To avoid the issue of non-conformity with national policy the council consider that the reference to design standards and the London/ Parker Morris space standards should be removed. Any enactment of space standards would also have to be supported by evidence supporting their requirement. Please see additional commentary on this specific policy requirement on contained in the response to policy H1 below. (comment 8)
8	Policy H1	It is not clear why this policy refers to appendix 13. In the information

		provided this is a consultation document seeking views on developing a vision. These references should be removed. As previously advised the policy should reference the C& S Design guide and also the NNDC design guide which is part of the development plan
		Bullet 2 references requirement for archaeological investigations. This is a similar requirement to the NNDC development plan contained in EN8
		London Housing Design Guide. (please also refer to comment no 7) Notwithstanding the comment above there needs to be greater justification on the requirement for space standards in the first place and then the appropriateness for the London standards to be applied to the rural setting of Corpusty and Saxthorpe followed by an assessment of viability. The council consider that this view has not been adequately explained and the justification required for the departure of from the nationally prescribed standards contained in the Building Regulations has not been given. These were introduced after the government's 2012 – 2015 Housing Standards Review. **The reference to the requirement should be deleted.** As previously advised the Ministerial Statement of March 2015 provides clarification on national policy approach and the interpretation of the NPPF para 95. (See section beginning Housing Standards: streamlining the system). This written ministerial statement sets out the government's new national planning policy on the setting of technical standards for new dwellings. The new system comprises new additional optional Building Regulations on water and access, and a new national space standard and collectively called the "the new national technical standards". We note that previous advice around this has partially been taken on board and references to the requirements for Lifetime home standards have been removed, however It is not clear why the NP has replaced requirement for lifetime homes standard with an approach that is equally not prescribed through national policy. **It is the council's recommendation that this requirement is withdrawn**. Furthermore the NPPF requires that plan making requires careful attention to viability and that the costs of polices do not place such a scale of obligations on development that viability is threatened. An assessment of the overall cost in relation to this and other "policy burdens" is not included in the supporting evidence to the NP. In addition the link that is in the policy takes the reader to the interim standards 2010. It is believed these are these are not the full current standards used across London and further clarity would be required requiring which aspects are required along with further consultation where the NP to persist along this route. Since then key standards for the London Housing Guide, have been incorporated into a new London Plan. In 2012 the Greater London Authority published Supplementary Planning Guidance (SPG) and it is understood that this included the full set of standards from the Interim LHDG, retaining the two–tier status but renaming them Baseline and Good Practice standards, however in practice some of the secondary space standards were

		not applied across private housing and that the SPG also expanded the London Plan to cover over 77 flat and house types and created minimum gross internal floor area requirements for dwellings for those with bedspaces for 1person up to 12 persons. The SPG is understood to have effectively streamlined the three sets of space standards which were previously in existence but produced separately for the National Housing Federation, NHF, Homes and Community Association HCA, and the GLA over the preceding few years, into a single set. However it remains questionable whether it really translates into a North Norfolk context. Irrespective of this it is considered that it is pre NPPF and predates the Government's 2015 Housing Standards Review and March 2015 Ministerial Statement where local Planning Authorities are advised to restrict the introduction of local standards unless they are the prescribed "new national technical standards" detailed in the Building Regulations and the policy approach set out in the march 2015 Ministerial Statement.
8 cont		As in point 5 above - Technically development outside the settlement boundary is limited to that which is required for a rural location. We have previously commented that the council's development plan sets the policy context for development outside the settlement boundary and that this is a strategic policy which the NP is required to be in conformity with. *this section of the policy should be deleted*
		The last section of this policy conflicts explicitly with section 7.1 where it states that development will NOT be permitted outside the settlement boundary. See note 5 above. The last bullet is a repeat of Local Green Space and in not required. **For simplicity and to avoid confusion of applying this policy it is recommended that this section – bullet 10,11,12,13 are deleted.** A separate policy requirement that seeks to limit additional growth of the settlement to 10% of the existing size of the settlements could be introduced (bullet 11&12) however at this stage the council considers that no justification has been provided for this approach and or an explanation as to how the figure of 10% has been arrived at. – How may dwellings would this entail? And how does this fit into the objectives of increasing homes? In addition there needs to be some consideration in how this policy would conform with the NNDC policy SS3 that allows for the flexible provision of dwellings across all 16 service villages
9	Policy H2	The policy is slightly confusing and would benefit from re wording and re structure. The policy mixes up the requirements for affordable housing and technical standards and could be simplified.
	Policy H2	Bullet one - is a duplication of national and local policy and could sit outside the policy box. It also needs to be changed to a positive – affordable housing contributions will be required on schemes of 10 or more. **Bullet 4 is also required to stipulate 10 or more and not 11**
		The indented Bullet 2 is not required - delete
		Third bullet (indented) is a policy requirement in its own right and needs to be a main bullet.
		The 4th bullet should come above the 3rd
		The criteria approach to the requirements for the increased technical standards is welcomed.
		Notwithstanding the above, although the aim of accessible and adaptable

		homes is generally supported there needs to be a reasoned justification in the text and the requirement and proportions evidenced. As it reads the policy requires adaptable and accessible housing standards to be applied only to affordable housing as that is what the policy is called. WHY? – What about market housing? The policy requires 2 different percentage requirements for M4(2) 20% and 30 % If the intention is to apply a different requirement to market housing then there needs to be reasoned justification and a separate policy outside the affordable housing policy. Although the demographic projections are footnoted in the policy It is considered that further justification is evidenced in the NP or in a specific evidence document and that the technical standards element is separated from the affordable housing policy. A Technical Standards policy could be inserted covering market and affordable housing as long as it can be supported and evidenced as to why it is required. Combining the 2 policy areas introduces potential conflict and confusions. **The council's advice is to separate out the policy requirements into 2 simple policies covering affordable housing and Technical Standards - as long as the approach is evidenced and there is a justification for it.** The strategic policy of the development plan - Core Strategy - HO1 already stipulated that 20% of dwellings should be suitable or easily adaptable – although this pre dates the new Technical standards / Building Regulations options the Neighbourhood Plan policy could seek to conform with this and by adding text clarifying suitable and adaptable now means the new technical standards contained in Building Regulations. **It is not clear what the purpose and meaning behind Subsection 4 under bullet 3 which says *and the provision of 2 or 3 bedroomed properties reflects the existing mix of houses*** The main aspect of the affordable housing policy is to ensure that the percentage requirement does not fall below 25%. The existing Strategic policy of the Council seeks 50% affordable housing contribution and the policy references this. Affordable housing contributions are negotiated in relation to the complete development plan "ask" the risk with this approach is that : The starting position is reduced to 25% rather than 50% and no viability justification has been provided for this. Although this may mean other monies are available for other obligations such as education contributions etc. it does mean that one of the main aims of the Neighbourhoods Plan which is to increase the quantity of Affordable Housing and increase the availability of housing for young families is potentially compromised by this policy. **It is considered that the policy must include reference to a viability assessment to prevent the intended minimum 25% affordable housing requirement becoming the maximum amount that is delivered.** The council consider that the percentage of affordable housing required is best evidenced through the Local Plan and emerging Local Plan where additional viability evidence has been commissioned. Never the less if the NP group seek to stipulate a minimum threshold for affordable housing the policy should seek proposals for anything less than the strategic policy

		requirement to substantiate the affordable housing percentage through a viability assessment in a format suitable to the Council. **This requirement should be added to the policy** **The council's strategic policy H02 also stipulates a site size threshold as well as no of dwellings threshold for affordable housing provision. To remain in conformity the neighbourhood Plan policy H2 should reference these thresholds or the requirement to comply with the Core Strategy policy and subsequent revisions.** Consideration should be given to rephrasing the affordable housing policy element along the lines of: *"On sites of 10 dwellings or more or of XX hectares, 50% of the dwellings shall be provided as affordable housing unless a submitted viability appraisal has been reviewed by the Council or their agent and concluded that the scheme is only viable to provide a lower percentage of affordable housing. The aim is that even when there is a viability issue that at least 25% of all dwellings will be provided as affordable housing."*
10	Community Aspiration CA1	The aspiration is noted. The council have previously advise that the statutory provision of housing is implemented through the Choice based lettings scheme and the council's allocations policy. This is a statutory requirement and will take precedent over the aspiration.
		The council have previously advised that aspects of this Aspiration have the potential for direct discrimination on the grounds of ethnicity and race. The plan therefor is at risk from failing to comply with the basic conditions. Local connection requirement includes employment where there is an essential or functional need to live close to the place of work in Corpusty parish or an adjoining parish. However, potential occupiers with a protected characteristic of race or ethnicity are more likely to qualify under employment than residence or family connection. Only employment connection includes a need to live in the area. The aspiration should be amended - so discrimination is removed – so delete reference to needing to live in the parish or adjoining parish for work. In relation to a local connection the policy says "Has an essential need to live close to another person, due to a proven age or medical reason (such as essential care)" **this does not limit the connection to someone who lives locally but allows anyone from across the country who has a need to provide care to an existing relative**. It is too wide a criteria for a local connection and it is considered that the aspiration should refer to an essential need to live close to another person in the parish or adjoining parishes.
11	Policy H3	The policy could be simplified and focus only on the mix and type of housing. In general this is a repetition of policies that are already included in other plans and adds little or no local distinction, other than giving an element of support to bungalows. To be an effective policy the policy needs to stipulate what is required – at the same time as being in conformity with the development plan - currently policy HO.

		Consider making the requirement to accord with the development plan policies the first bullet and the second bullet replaced with the current first paragraph. The remainder of the wording in the policy does not inform how a proposal should be determined. The reference to the non acceptability of uniform design and the use of the intention to provide characterful development through the reference to the Design guide in Appendix 5 and repeated later in the Neighbourhood Plan is an aspiration and could be re packaged as such. This is also covered in the design section and for simplicity and clarity could be removed from this section. There is the potential for confusion between interpretation of H3 and H2. It is not clear why only a small proportion of bungalows will be accepted when policy H2 requires adaptable properties. A bungalow will generally be preferable in meeting these requirements.
11	Policy H4	This policy is a continuation of policy H1 and covers some similar areas. For clarity in interpretation and effectiveness of the Neighbourhood Plan there should only be one policy covering development inside and outside the settlement boundary and policy requirements should not be repeated. Repetition with other polices should be removed. The last section of this policy could be combined with policy H1. Bullet 3 & 4 could refer to other designations, while clarity needs to be given around what is meant by non-greenfield sites. The last section of the policy beginning – *outside the settlement boundary windfall housing will only be acceptable ….* Seems to conflict with the 9th bullet point in policy H1 where it states that "*development outside the development boundary will not be permitted unless the benefits outweigh any adverse impacts….."* **Recommended that the approach is simplified to allow interpretation and address potential conflicts between policies and conformity issues.**
12	Policy E1	This policy area is covered in the NPPF para 112 /G - Local planning authorities should take into account the economic and other benefits of the **best and most versatile agricultural land.** Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Plans should not duplicate other plans The policy requirement is therefor only to provide the Grade 3a/3b assessment.
13	Policy E3	It is recognised that this proposed policy has been amended to reflect previous advice specifically around the existing legislation however The NPPF is explicit in that development must follow the 'mitigation hierarchy' (para 118). There is a danger that elements of this policy duplicate the general NPPF policy requirement. Protected species and habitats receive strict protection through various legislation, the plan and policies should not attempt to reproduce these or counteract these laws and policies.

14	Policy E5	Reference to Design policies in Appendix 5 – clarity is sought previous references have been to design guidance. It is considered that you may accidently introduce a policy that conflicts with your policies on conservative approach to character as carbon neutral and zero carbon houses tend to be on modern design. – How would you like any such conflict to be considered? Some explanation around this issue should be included in the design section.
15	Policy HE1	The requirement of all application within 250m of an existing Historic Environment Record to consult with Norfolk Historic Environment Service is thought to be restrictive. As existing, the LPA does not formally consult the Norfolk HES on any applications, HES service already receive NNDC weekly application list. Currently HES decide what they wish to comment on in accordance with their priorities and available resources. For this reason and the fact that HES are not a statutory consultee it is difficult to see how this policy objective would ever come to pass. **It is recommended that HSE are specifically consulted for their view on the proposed policy approach.**
16	Policy HE2	The policy concentrates on the views of the two churches and **fails to recognise the wider issue of 'setting'.** To be effective the policy should reference the wider setting of the church. See advice contained in Historic England's note on "Settings and Views of Heritage Assets" which mentions, the historic relationship between places can be equally as important as can environmental factors
17	Design Guidance	It is assumed this section is to provide further guidance on the existing design characteristics of the Neighbourhood Plan Area to inform earlier policy references. Previous advice advised around the potential for this guide to be too restrictive, steering developers towards pastiche reproductions of existing built forms and detailing. No mention of the benefits of good quality contemporary architecture. This could lead to non conformity with the NPPF and strategic policies (EN4). The Council acknowledge and welcome some of the revisions which have been made in response to earlier comments. It is noted that the guidance now includes a reference to carbon neutral and innovative architecture which closer aligns the guidance to the councils design guidance which offers some encouragement to appropriate innovative design. Figure 16 – A minor point but the annotation under the image of Great Yard refers to a "hipped pantile roof". Surely this incorrect as this row of properties only features gabled roofs. This is also repeated in Appendix 5. Your attention is drawn to the figure used in the NNDC Design Guidance page 26 ref 3.4.9. Paragraph 4.2 The text refers to the NNDC Design Guide but the footnote link directs people to the Government's housing technical standards (something which is also repeated in Policy DC1 on the following page). It is not clear why this has happened, particularly as no mention is made of the Government guidance within the supporting text. **It Is recommended that additional text is added around the NNDC guidance and the correct link used**.

		https://www.north-norfolk.gov.uk/section/planning/planning-policy/ There remain references throughout the NP to design guidance in the appendices and to that contained in the body of the document. As far as can be seen these remain the same documents and in order to avoid confusion and duplication the NP could choose one place for this guidance to sit.
18	DC1	As above the Foot note is incorrect and should be removed. Policy and or text would benefit from referencing the development plan strategic policies on design as well as the NNDC design guide; however this can be done in the pre text to the policy. Reference to density is a repetition with overarching policy 3 and should be removed from one or the other. The policy element does not include reference to the NP design guide or character examples - is this the intention?
19	Policy DC2	The policy is not necessary as it is a reference to national and local policy
20	Policy B1	Add *priority* Areas 3 - clarity
		It would be helpful if "employment generating " was defined - The core strategy defines as: Use Class B1, B2 and B8, petrol filling stations, car / vehicle hire, the selling and display of motor vehicles and builders yards. I
		The NPPF test for refusal on highway grounds would be where the residual cumulative impacts of development would be server – see para 32 of the NPPF. As written the policy that calls for applications to be refused due to significant increase in heavy goods vehicles is not in accordance with national policy and could be seen as restrictive.
21	Policy B2	The NPPF states in para 32 that all development that generate a significant amount of movement should be supported by a transport statement or assessment and details what should be included see NPPF para 32. Perhaps this policy should reference the national requirement but add a local requirement around the requirement of the transport assessment to set out how the proposal will seek to minimise conflict with other road uses and maximise safety. See also policy CT5 of the NNDC Development Plan
22	Policy ED2	This policy requires all development to contribute to the library service. This is below the current threshold of 20 dwellings used by NCC. **Although this is a local distinction it is recommended that a view is sought directly on this requirement by the responsible authority.**
23	W&F1	It is noted and welcomed that this policy has been changed to reflect previous comments around the requirement for consent, however it remains that it is considered that the use of the church is not a land use matter rather a matter for the religious authorities. The first part of this policy should be deleted. The last line of this policy is either missing a word between "by" and "of" or one of these words needs to be deleted. Because the Diocese doesn't actually work to any formal criteria the Council would favour the phrase "*and they are acceptable to the Diocesan Advisory Committee*" at the end. (We not aware the word "Board" has any meaning within a local ecclesiastic context).

24	T1	NCC are the Highway Authority and advise on highway safety. Matters around highway safety and development proposals will be determined with regard to statutory requirements as determined by the Highway Authority. Contributions as deemed by the parish council should be seen as an aspiration and the policy requirement amended. It should be noted that contributions can only be collected where it is necessary to make a scheme acceptable and that there are "pooling" restrictions around the collection of monies for specific schemes. **If the requirement for traffic calming measures have been identified as an issue for the NP to address within the settlement boundary of Corpusty and Saxthorpe then a specific calming scheme could be drawn up (in association with Highways) and detailed in this Neighbourhood Plan. This would be adding local distinction and approach through Neighbourhood Planning.**
25	T2	In order to assist in future proofing this policy it should refer to the Development Plan rather than the Core Strategy.
26	T3	Why limit contributions to improve bus shelters to proposals of less than 600m from a bus stop. Would it not support the provision of public transport and local facilities if all development were to contribute to improving the public realm especially those in relation to public transport? As previously mentioned the parish council should be aware of "Pooling restrictions" for specific proposals.
27	Sustainability Appraisal	As per previous advice it is considered that the SA remains incomplete and needs more work. It should to refer to the full SA framework and review policies against the possible positive, negative and neutral impacts and measure the policies against the SA objectives. It should conclude objectively how each policy performed against the SA objectives. This then helps to demonstrate how the NP policies contribute to achieving sustainable development and will be useful in helping the NP group to fulfil one of the Basic Conditions at submission where it is necessary to demonstrate how the NP contributes to sustainable development.

To assist in the next stages the Council have produced a submission check sheet along with guidance around conformity with the Strategic Policies and other Basic Conditions tests which the final submission neighbourhood plan will have to refer to and which will be tested against. These will be available shortly on the Planning Policy web pages of the Council's web site