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INDEPENDENT EXAMINATION OF THE RYBURGH NEIGHBOURHOOD DEVELOPMENT PLAN

By email to: Christopher Collison (Independent Examiner)

Copy to: Chris Brown, Project Support Officer (NNDC), Mike Rundle, Secretary (Ryburgh Neighbourhood Plan Working Group), Iain Withington, Planning Policy Team Leader (NNDC)

Dated 22 July, 2020

Dear Mr Collison,

Ryburgh Neighbourhood Development Plan Independent Examination – Response to Examiner letter seeking clarification of matters

Further to your letter of 16 July 2020 seeking clarification on a number of matters, Ryburgh Parish Council are pleased to respond as follows:

Policy 1

1. A representation states “*the roads named do not extend beyond the village confines/built environment*”. The supporting text and justification in the Neighbourhood Plan, and in the photographs in Evidence Document 4, have a focus on the public highway that is the high street of Great Ryburgh “*in the village*”. I have noted some digital maps indicate Bridge Road extends from Station Road Great Ryburgh in an easterly direction as far as the A1067, and Fakenham Road extends from Station Road Great Ryburgh in a westerly direction as far as the B1146. As a point of clarification could you please confirm whether it is intended the policy should relate to this entire length of road, or whether it is intended it should relate to the parts of the named roads that are within or immediately adjacent to the settlement boundary identified in Annex 5 of the Neighbourhood Plan.

Response

It is intended that Policy 1 should relate to the parts of the named roads that are within or immediately adjacent to the settlement boundary identified in Annex 5 of the Neighbourhood Plan.

Policy 2

2. Paragraph 4.2.2 of the Neighbourhood Plan states “*It is accepted that Policy 2 cannot apply to that part of the dismantled railway passing through the Industrial Site where it is impracticable due to existing buildings.*” This is not consistent with Policy 2 and not consistent with the map at Annex 4 of the Neighbourhood Plan.

Please clarify whether it is intended Policy 2 should relate to the dismantled railway “both north and south of the Crisp Malting site, but not including that site (identified on the Map in Annex 4)”. In your response could you please explain the relationship between Policy 2 and strategic policy CT7 in respect of this issue.

Response

Policy 2 is intended to apply to the whole length of the dismantled railway with the exception of that part passing through the Industrial Site where it is impracticable due to existing buildings. Policy CT7 relates to the dismantled railway without this exception. The Parish Council have introduced the exception to its Policy in response to a request by Crisp Maltings to do so.

3. Policy 2 includes the term “fully incorporate green infrastructure principles”. Please clarify where in the Neighbourhood Plan these principles are defined?

Response

There is no definition of the expression in the Neighbourhood plan. It is suggested that the following words be added at the end of Policy 2. “The expression “green infrastructure” shall have the meaning given to that expression in Annex 2: Glossary – National Planning Policy Framework - February 2019”.

Policy 3

4. Please direct me to the existing evidence that supports the limit of up to 5 dwellings.

Response

Evidence Document No1 (Housing Report) Page 3 deals with recent house building in Great Ryburgh. An average of 2.4 dwellings were completed each year in Ryburgh Parish during the period 2001-2016. This was taken to be historical evidence of the growth of the village in recent years acceptable to and consistent with the residents’ conception of their village. Page 4 of the Housing Report establishes a low ‘local housing need’ and the responses to the supplementary housing questionnaire (Para 4.3.9 of the Submission Version of the Neighbourhood Plan) also support a limited level of new housing. Having regard to this evidence the Working Group adopted the figure of 5.

5. Given the settlement boundary is clearly defined, could you please explain the purpose and meaning of criterion 3.

Response

It is a statement of intention additional to the defined Settlement Boundary and clarifies the intention of the Settlement Boundary.

6. Please confirm the District Council has not provided a housing target at neighbourhood area level, and the Parish Council have not requested an indicative housing requirement figure.

Response.

Confirmed. Ryburgh Parish is identified as open countryside in the existing and emerging Local Plan. It is situated outside of the settlement hierarchy where residential development would normally be permitted. As such no housing target has been identified in strategic policies.

No housing target has been requested by the Neighbourhood Plan Working Group from the District Council, but in recognising the small-scale nature of the village of Great Ryburgh and seeking to support a small, but limited, amount of growth through the establishment of a settlement boundary and an infill policy,

the ambition of the community to plan for the sustainability of Ryburgh is supported by the District Council. No conformity issues have been raised by the District Council in this regard.

The approach for housing recognises a level of local need which is demonstrated as being 'limited' in Evidence Document 1 - Housing Paper, which references the Districts Council's record of those with a local connection in housing need, and, two resident questionnaires.

7. Please confirm the abbreviation HRA refers to Habitats Regulations Assessment.

Response

Confirmed

8. Please explain how the final two sentences of Policy 3 relate to the policy title. Please also explain how these sentences serve a clear purpose by providing an additional level of detail or distinct local approach to that set out in the strategic policies.

Response

It is accepted that these sentences offer nothing additional to the provisions of the NNDC Local plan and could therefore be omitted from Policy 3.

Policy 7, Policy 8 and Policy 10

9. Please direct me to the existing evidence that supports the **precise** boundaries of the habitat area identified on the Map in Annex 6.

Response

As stated in Para. 4.5.2 of the Neighbourhood Plan the extent of the habitat area is drawn to incorporate the open and undeveloped areas which are the flood plain of the river valley and its tributaries. The object of Policies 7&8 is the protection of the Environment and that object is not susceptible to precise boundaries. Nevertheless, the extent of the area adjoining the River Wensum and its tributaries which has not been subject to intensive agriculture is clearly defined on the ground by the long term absence of intensive farming damage, natural grass, drainage channels, marshy ground and an abundance of insect life and bird life. The existing evidence relied upon as to the extent of the land is therefore that the area identified in Annex 6 is readily identified as being of ecological importance and as a part of the major ecological corridor referred to in Para.1 of the Ecological Report (Evidence Document 3).

The Inspector will have noted from the Consultation Statement the very considerable level of acceptance for the boundaries defined by Annex 6.

10. Please direct me to the existing evidence that supports the **precise** boundaries of the open land area identified on the Map in Annex 7.

Response

As stated in Para. 4.5.2 of the Neighbourhood Plan the extent of the Open Land is the area that makes an important positive contribution to the appearance of the area as a visual amenity. The object of Policy 10 is the protection of the very unique setting/landscape which characterises the village of Great Ryburgh and a setting is not susceptible to precise boundaries. The evidence relied upon to fix the boundary is the patent beauty, tranquillity, richness of wildlife and historic significance of the Wensum Valley and its tributaries and the evidence as to the extent thereof is as stated above in the Response to Para.9. We also rely upon the correlation between the extent of valley landscapes contained in Evidence Document 2 and those identified in Annex 7.

The Inspector will have noted from the Consultation Statement the very considerable level of acceptance for the boundaries defined by Annex 7.

11. Please advise me where the variation between the “North of Great Ryburgh small field landscape” area identified on page 108 of Evidence Document 2, and the area in that vicinity identified on the Map in Annex 7 is explained.

Response

The colour coding of the “Landscape Character Areas” of Evidence Document 2 requires explanation from Mr Yardley. We have raised this with him (see attached exchange of e-mails on 20th July) and he has corrected the colour coding of the Landscape Character Areas map. The variation between “North of Great Ryburgh small field landscape” and that area as shown in Annex 7 is because the Annex 7 map was drawn without reference to the Landscape Report, and substantially follows the Habitat Areas Map (Annex 6). It is accepted that it is arguable that the whole of the North of Great Ryburgh small field landscape should be included in Annex 7 because it forms an integral part of the landscape and visual amenity enjoyed by the houses on the North side of the village high street.

12. Could you please confirm the key to the Map on page 108 of Evidence Document 2 incorrectly switches the colour coding of the Lt Ryburgh and North of Great Ryburgh small field landscape areas.

Response

We have raised this with Mr Yardley and he has adjusted the Map as mentioned in Response 11 above.

Responses dated 22nd July 2020

**Signed: Patsy Adams
Parish Clerk**