

Mattishall Neighbourhood Plan Review – Regulation 14 Consultation – 08 November 2023 to 08 January 2024

LANDOWNER AND LOCAL ORGANISATION COMMENTS

Organisation	Section	Comments	Action Agreed by Mattishall Parish Council
Mattishall Methodist Church	ENV1 Map 4	Number 11 should refer to the Congregational Chapel at Old Moor, off Stone Road, rather than being of Methodist denomination. Not sure if you have already been advised of this by the owner, Anna Girling, who presumably had a copy of this letter.	Noted. Map 4 will be amended to refer to Congregational Chapel (No. 11).
Landowner	ENV4	Following my telephone conversation on Monday 4 December 2023, with David Fowler (Vice Chair of Mattishall Parish Council) I would like to confirm in writing that I DO NOT want the following three pieces of land to be designated as Local Green Spaces in the updated Mattishall Neighbourhood Plan, November 2023: Land off Back Lane - Site 3 on Map 7 in MNP2 Regulation 14, Nov 2023; South of Norwich Road - Site 7 on Map 7 in MNP2 Regulation 14, Nov 2023; North of Norwich Road - Site 8 on Map 7 in MNP2 Regulation 14, Nov 2023	<p>Noted. Sites 3, 7 and 8 and have been considered to be of particular importance to the local community. These proposed Local Green Spaces have been carefully assessed against the relevant NPPF criteria:</p> <p>Site 3 is considered to meet the LGS criteria: The site is not considered to be extensive and has a clearly defined boundary of dense mixed hedge. The site is immediately adjacent to the residential area in the village centre. The site helps to maintain the rural characteristics of the village and has crucially important historical significance. The site has been identified as being important to the local Mattishall Community (April 2023 Consultation exercise). This is a natural open green space which promotes wellbeing. It provides a pleasant wide view to northwest from Back Lane and its housing. An attractive, open easterly view from Bob Carter Court (Sheltered Housing scheme). 80% of Mattishall respondents regarded this site as being important for its “Beauty”.</p>

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			<p>The site is an important ancient historic site of a former structure, which is surrounded by a “moat” as indicated on OS mapping. It is essential that this site is protected for future generations to enjoy and for the village’s historic past to be further explored and understood.</p> <p>Natural and educational.</p> <p>A natural tranquil site which enables reflection and mindfulness.</p> <p>Seasonal nesting birds within the hedgerow and trees, and an important wildlife corridor for Muntjac, Roe Deer and hedgehogs. The ponds are used by overwintering Canada and Greylag geese. 78% of village respondents felt that the Richness of Wildlife was important.</p> <p>At the Regulation 14 public consultation exercise 89% of respondents agreed with the designation of this site as a Local Green Space. 87% of respondents thought that this site met the NPPF criteria.</p> <p>Site 7 is considered to meet the LGS criteria: The site is not considered to be extensive and is within close proximity of the community it serves. The site is local in character and scale. It is immediately adjacent to the village of Mattishall and is designated as a ‘Gateway vista’ within the Neighbourhood Plan. The space is demonstrably special to the local community and holds particularly local significance</p> <p>The site meets the criteria as follows: Beauty. This site has been identified by the residents of the village as being an important view and vista</p>

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			<p>with natural features. It is designated as such in the adopted Neighbourhood Plan POLICY ENV2. It is vital that this site is protected as a designated agricultural open space. 83% of village respondents regarded this site as having importance for its “Beauty”.</p> <p>Recreational value The site has a well used public footpath from the SE corner to a stile at the Oaks development. The site’s recreational value is in its resource for walkers and access to nature.</p> <p>Tranquillity Objective 1 of the Mattishall Neighbourhood Plan is “to protect and enhance the rural look and feel of the village and wider parish. During the Neighbourhood Plan preparation process 92% of residents stated that maintaining rural views and vistas as wildlife corridors was important. 84% of village respondents regarded this site as having importance for its “Tranquillity”.</p> <p>Richness of its wildlife Seasonal nesting birds, this area is transited by all forms of wildlife, Muntjacs, Roe deer, foxes and hedgehogs.</p> <p>At the Regulation 14 public consultation exercise 89% of respondents agreed with the designation of this site as a Local Green Space. 87% of respondents thought that this site met the NPPF criteria.</p> <p>Site 8 is considered to meet the LGS criteria: The space is not an extensive tract of land and is local in character. The site has clearly defined boundaries.</p>

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			<p>The space is local in character and scale. It is immediately adjacent to Mattishall village centre. Designated as a 'Gateway Vista' within the adopted Mattishall Neighbourhood Plan. The space is demonstrably special to the local community and holds particularly local significance</p> <p>81% of local respondents (Neighbourhood Plan April 2023 consultation exercise) wish to see this site designated as a Local Green Space. The site meets the following NPPF criteria:</p> <p>Beauty This site has been identified by the residents of the village as being an important view and vista. It is designated as such in the adopted Neighbourhood Plan POLICY ENV2. It is vital that this site is protected as a designated agricultural open space. 80% of village respondents regarded this site as having importance for its "Beauty".</p> <p>Tranquillity Valuable views of the Grade 1 listed St Peter's Church and long distance vistas to E and S across open farmland providing panoramic views of the village when approaching from the East along Norwich Road. Objective 1 of the Mattishall Neighbourhood Plan is "to protect and enhance the rural look and feel of the village and wider parish. During the Neighbourhood Plan preparation process 92% of residents stated that maintaining rural views and vistas as wildlife corridors was important. 84% of village respondents regarded this site as having importance for its "Tranquillity".</p>

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			<p>Richness of its wildlife Seasonal nesting birds within the hedgerows and Skylarks, Deer, and other country mammals.</p> <p>At the Regulation 14 public consultation exercise 85% of respondents agreed with the designation of this site as a Local Green Space. 83% of respondents thought that this site met the NPPF criteria.</p>
Landowner	ENV4	<p>I believe this policy should be very carefully considered in how it is applied. If asked for their views, 90% of the population will probably support most sites that have been submitted. Most residents don't want to see more spawning housing estates on the outskirts of the village. It is important that the village protects its linear development style, views and vistas and that more precious farmland is not lost to housing. However, these are largely covered by other policies. I would argue that, apart from being close to the community, and special in terms of their agricultural value, most of the sites proposed (that are not already designated community spaces) do not meet the required criteria. Stakeholder and landowner consultation is also important as this could cause disengagement with the community if against the wishes of the landowners. I am the owner of the land at site 4, and I strongly disagree that this site in particular meets any of the above requirements and have given my reasons in previous communication sent by email. I'm happy to provide these details again and engage with the PC further. As the Neighbourhood Plan Guidance material states, 'Care is required to ensure that green space policies are not being misused, for example through making designations to stop development, rather than to ensure proper green space provision</p>	<p>Noted. Robust evidence has been provided in support of Site 4 being proposed as a Local Green Space. The site has been carefully assessed against the relevant NPPF criteria.</p> <p>The site is clearly defined. It is a central village green space location which provides a natural interlude in the built environment. The site is within the village, immediately adjacent to the defined Local Plan settlement boundary.</p> <p>The space is demonstrably special to the local community and holds particularly local significance</p> <p>Mattishall residents have been consulted on the merits of designating this site as a Local Green Space. The Regulation 14 community consultation resulted in 80% of respondents agreeing that this site be designated as a Local green Space. In terms of meeting the NPPF criteria: Beauty The site has enormous visual importance to the residents of the village- a natural space with attractive clusters of trees. A pleasant view of former farmhouse and associated agricultural</p>

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			<p>buildings from both Rayners Way and Dereham Road. Important green space within the built residential area of the village. At the April 2023 Neighbourhood Plan consultation event 66% of respondents felt this was an important “Beauty” site.</p> <p>Tranquillity Provides a tranquil vista within a residential area. 60% of respondents felt this was an important “Tranquil” site.</p> <p>Richness of its wildlife Seasonal nesting birds, roosting site for Pipistrelle bats. Mature trees – range of broadleaf and conifer, bounded by wildlife rich hedgerows.</p> <p>The site’s landowners have been engaged at the appropriate time in compliance with the requirements of the NPPF.</p> <p>This site has been the subject of a planning appeal (Appeal Ref: APP/F2605/W/22/3301662) against a refusal by Breckland District Council to grant outline planning permission for the proposed development of 4 new single storey dwellings.</p> <p>The appeal was dismissed. The appeal inspector stated:</p> <p>“I therefore conclude that the development would not be acceptable in respect of flood risk. It would therefore be contrary to Policy ENV09 of the Breckland Local Plan (BLP) and Policy ENV9 of the Mattishall Neighbourhood Plan (MNP) which together state that development will be located to</p>

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			<p>minimise the risk of flooding, and that consideration should be given to surface water drainage. It would also be contrary to the advice set out in the Framework, which I have set out above.”</p> <p>In reference to biodiversity the appeal inspector stated:</p> <p>“Accordingly, I am unable to conclude that the proposed development would not adversely affect protected or priority species and habitats. Therefore, the proposal would be contrary to BLP Policy ENV02 and MNP Policy ENV7 which together seek to maintain and enhance biodiversity, and require development proposals that may affect species or habitat to be accompanied by an assessment of the effects of the proposal on flora and fauna, demonstrating how have effects have been considered and where necessary, mitigated. It would also conflict with advice within the Framework which states that planning decisions should minimise impacts on biodiversity.”</p>
Marrons on behalf of Bellway Homes - Landowners	ENV2	<p>Draft Revised Policy MNP ENV2 seeks to amend and increase the number of Important Views and Vistas in the Parish from three to seven.</p> <p>Bellway Homes support the removal of Important View and Vista c) identified in made MNP Policy ENV2, recognising its limited significance. Bellway Homes do, however, object to the proposed identification of Important View and Vista 4 in Draft Revised Policy MNP ENV2. As shown in the photographic evidence provided by the Parish Council in Appendix 3, the view and vista is very limited in this location owing to the proximity of existing development and tree-lined boundary. Links in original document to: 1 Ministry of Housing,</p>	<p>Noted.</p> <p>Proposed modification to MNP ENV2. This policy to be amended to better clarify the description of View 4 in Paragraph 2. Revision to state that View 4 “from public footpath in field bordered by Thynnes Lane and Welgate be removed from “Views from the countryside looking into the settlement” to “Views from the edge of the settlement looking out into the countryside”.</p>

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		<p>Communities and Local Government, September 2023 2 Ministry of Housing, Communities and Local Government, published 6th March 2014, last updated 25 September 2020.</p> <p>Bellway Homes therefore respectfully requests that Important View and Vista 4 is removed as a proposed Important View and Vista from Draft Revised Policy MNP ENV2.</p>	
Marrons on behalf of Bellway Homes - Landowners	ENV4	<p>Draft Revised Policy MNP ENV4 seeks to designate an additional eight Local Green Spaces in the Parish, including Site 5: Thynnes Lane. The NPPF is clear that the designation of a Local Green Space should be consistent with the local planning of sustainable development and compliment investment in sufficient homes (Paragraph 101), and is required to meet identified criteria (Paragraph 102).</p> <p>A summary of each proposed Local Green Space designation is included in the Reasoned Justification for Policy MNP ENV4 at Paragraph 7.25, and the consultation is supported by an Open Spaces Assessment.</p> <p>The summary for Site 5: Thynnes Lane reads: “The site is an agricultural field north of Thynnes Lane, East of Welgate, South of Cedar Rise noted for its richness in wildlife. There are distinctive views of Mattishall village from south – see View 4 in Policy ENV2. A well-used footpath dissects the site. The principal function of this space is as a publicly accessible (footpath only) open space and through the visual amenity it provides to walkers.”</p> <p>The Open Spaces Assessment describes each proposed Local Green Space and makes an evaluation against the criteria set out in NPPF Paragraph 102. The assessment of Site 5: Thynne’s Lane is recreated below: (see Marrons letter – copy of table from draft plan).</p>	Noted. However, the stated NPPF paragraphs are incorrect. NPPF December 2023: Paragraph 101 is now 105; 102 is now 106.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Bellway Homes consider that the proposed designation of Site 5: Thynnes Lane as a Local Green Space is contrary to NPPF Paragraph 101. Breckland District Council have commenced a Full Update to the adopted Local Plan and are seeking to make provision for additional growth in the District, including at Local Service Centres such as Mattishall.	The Parish Council does not view the proposed designation of LGSs as a mechanism simply to thwart development. Each site has been assessed against the relevant criteria(see below) and, importantly, the Neighbourhood Plan as a whole has been positively prepared and can be

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		<p data-bbox="472 188 1375 387">Thynne's Lane has been submitted to the Call for Sites exercise supporting the Breckland Local Plan Full Update process, and it is considered to be a strong candidate for allocation for residential development given its close proximity to the village centre and accessibility of services, in particular when compared to other limited options in the village.</p> <p data-bbox="472 459 1375 592">Designation of Thynnes Lane as a Local Green Space would limit the potential to deliver sustainable development and restrict Breckland District Council's ability to allocate sufficient sites to meet emerging housing requirements.</p> <p data-bbox="472 695 1375 963">Bellway Homes also consider that the proposed designation of Site 5: Thynnes Lane as a Local Green Space is contrary to NPPF Paragraph 102 as the criteria set out are not adhered to. Much of the Parish Council's evidence supporting consideration of whether Thynnes Lane holds particular local significance due to its beauty, recreational value, tranquillity and richness of its wildlife is reliant on the views of local residents from the April 2023 engagement event as opposed to the views of any qualified body.</p>	<p data-bbox="1406 156 2040 220">evidenced to contribute to achieving sustainable development.</p> <p data-bbox="1406 292 2063 624">It is not the case that the site has been allocated solely on the basis of community feedback only. In fact the Parish Council has carefully considered this site against the NPPF (Paragraph 105) criteria for designation as a Local Green Space. It has been subject to a detailed objective assessment as required by the NPPF. It is considered to be of special importance to the Mattishall community, evidenced by the site assessment.</p> <p data-bbox="1406 695 2040 895">The site assessment identifies this site as not being extensive, is an agriculture- arable field, dissected by frequently used public footpaths- one east/west, one following northern perimeter, with clearly defined boundaries.</p> <p data-bbox="1406 935 2040 1066">The space is local in character and scale. It is immediately adjacent to Mattishall village centre and accessed by well used public footpaths, giving access to open countryside.</p> <p data-bbox="1406 1070 1962 1134">The site meets the following NFFP criteria: Beauty:</p> <p data-bbox="1406 1139 2040 1339">The site forms part of the transition from the domestic and suburban form of development along Cedar Rise and Thynnes Lane into the agricultural landscape beyond. The site makes a positive contribution to the rural character of the area.</p> <p data-bbox="1406 1343 2040 1407">This site has been identified by the residents of the village as being an important view and vista. It</p>

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			<p>is designated as such in the adopted Neighbourhood Plan POLICY ENV2. It is vital that this site is protected as a designated open space as it provides an open rural gateway to the village.</p> <p>77% of village respondents (April 2023) regarded this site as having importance for its “Beauty”.</p> <p>Recreational value: Footpath running approx. west/north west to East/South East across the site. Much used by local walkers, bird watchers and dog walkers. Footbridge across large drainage ditch used for recreation and an alternative “off road” access route to village centre.</p> <p>This site has clearly demonstrated local significance for recreation. The public footpaths roads were established over a long period of time to serve functional, local needs, and have played an important role in shaping the Mattishall communities' experience of their immediate surroundings. The recreational value of this site supports a variety of health and wellbeing benefits to pedestrians and dog walkers. It and meets the characteristics set out in “ONS: Health Benefits from recreation, natural capital, UK 2022”. This site is special to the local community in recreational terms through:</p> <ul style="list-style-type: none"> • Supporting physical fitness • Helping to lower stress levels. • Experience the countryside first hand. • Walking with others is of social benefit. • Being out in nature is uplifting for the spirit. • You help continue a long tradition of using public rights of way.

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			<ul style="list-style-type: none"> • Using the two site footpaths to link to a broader network of paths. • You learn about your local environment. • You experience a firsthand view of wildlife. <p>The recreational value of the public footpaths is achieved because of the access to the countryside, the rural character. Footpaths in a “built up estate” do not offer the same recreational value.</p> <p>90% of village respondents regarded this site as having importance for its “Recreational Value”.</p> <p>Tranquility: Pleasant open views to S and E across open farm land and to N and W to village houses, mainly screened by rich wildlife hedges. Objective 1 of the Mattishall Neighbourhood Plan is “to protect and enhance the rural look and feel of the village and wider parish”. During the Neighbourhood Plan preparation process 92% of residents stated that maintaining rural views and vistas as wildlife corridors was important. 77% of village respondents regarded this site as having importance for its “Tranquility”.</p> <p>Richness of wildlife: The site is an important wildlife corridor. It is a nesting and roosting site for birds; also water vole inhabit the water banks. 64% of village respondents regarded this site as having importance for its “Richness of Wildlife”.</p> <p>The site is bordered by some extremely old hawthorn hedge according to the Woodland Trust. Wildlife survey observations: 19.7.23 06.30 Wood pigeon, Dove,</p>

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			<p>Great tit, Carrion crow, Rook, Wren, Robin, Long tailed tit, Chaffinch, Blackbird, Sparrow, Skylarks, Rabbits. 26.7.23 18.00 Wood pigeon, Rook, Crow, Dove, Yellowhammer, Blackbird, Red kite, Squirrels.</p> <p>7.8.23 Buzzards, Red kites. Skylarks nested in this area earlier in the year. Barn owls and Tawny owls seen early in the morning and late in the evenings. Bats seen in the evening. Evidence of foxes. The site has been subject to extensive community consultation. Appropriate statutory bodies have been consulted as part of the Regulation 14 process. The April 2023 public consultation exercise resulted in 84% of respondents regarded the site as a highly important Local Green Space for the village. Within the Regulation 14 public consultation 89% of respondents agreed with the</p>

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			<p>designation of this site as a Local Green Space; 83% thought that the site met the NPPF criteria.</p> <p>Through the statutory body consultation, Norfolk County Council has advised that the Norfolk County Minerals and Waste Local Plan identifies this site for safeguarding for sand and gravel extraction.</p> <p>Mattishall Parish Council is mindful that the Breckland Local Plan is currently under review (Regulation 18). The Parish Council is playing a positive role in participating in the District Council's consultation process. Through this Local Plan review process this site is recognised in the council's evidence paper 'Call for Sites - initial Phase 1 Site Assessments and proposed site selection process' published alongside the most recent Local Plan consultation. Appendix 1 of the report is available here: ajwcd4ybggkd7wijmfqx.pdf (cloudfinary.com) . This site has been submitted both as a Local Green Space and as a Development site.</p> <p>Through the Local Plan review the Parish Council do not support the site for development. The Parish Council's Local Plan Local Green Spaces submission is consistent with the approach proposed via this Neighbourhood Plan.</p> <p>This NP pre submission document consultation has been prepared consistently with the current strategic policies of the adopted Breckland Local Plan. Breckland has a 6.4 year housing land supply. Mattishall has exceeded its Local Plan housing allocation. The Local Plan Policies allow for housing development within the identified settlement boundary for Mattishall. No further</p>

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			<p>housing sites are required to meet that current allocation.</p> <p>NPPF Paragraph 105 makes it clear that the designation of Local Green Spaces “allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.” This is precisely the approach taken by Mattishall Parish Council in preparing this plan.</p> <p>Mattishall Parish Council has undertaken the process of Local Green Spaces designation observing the advice of Natural England and Planning Policy Guidance PPG 6/3/2015 DLUHC Paragraphs 006-022.</p> <p>NPPF does not require the “views of any qualified body”. However, the Parish Council’s Neighbourhood Plan Steering Group is Chaired by a qualified Town Planner and professional advice has been sought from qualified planning consultants. The Parish Council appreciates the support that has been appropriately provided by Breckland District Council.</p> <p>This site has been proposed for Local Green Space designation because it has been identified by the local community as being of particular importance to it. Its designation as Local Green Space is consistent with the local planning of sustainable development and complements investment in sufficient homes, jobs and other</p>

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			essential services. This is evidenced within the NP's supporting text being in general conformity with the adopted policies of the Breckland Local Plan.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued- Taking each of those considerations in turn, Bellway Homes rebut that conclusions of the Open Spaces Assessment as follows:	See comments above.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Beauty : The Parish Council suggest the Site's beauty is the contribution it makes to the transition from the urban area to open countryside, but clearly this is true of any land parcel which abuts the boundary of the built-up area. Indeed, this is more limited at Thynne's Lane given the land is contained by residential development to the west and south-east, with development forming part of the landscape to the east. Whilst recognising that Important View and Vista c) of made MNP Policy ENV2 runs across the Site, this does not contribute in itself to the beauty of the Site. Indeed, ENV2 supports development proposals which take account of Important Views and Vistas, which can be achieved through careful masterplanning of Thynne's Lane. Indeed Draft Revised Policy MNP ENV2 proposes to remove this Important View and Vista, recognising its limited significance.	See comments above.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Recreational Value : Recreational use of the Site is limited to the Public Rights of Way, which would require retention or diversion through any development proposal. Indeed development of the Site would likely result in improvements to the existing Public Rights of Way and provide additional connections between the village and wider countryside, this increasing its recreational value. Overall the Site is in agricultural use and thus holds no recreational value.	See comment above.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Tranquillity : The Parish Council appears to have misinterpreted the meaning of tranquillity which is a sense of calm and peace, rather than the contribution land makes to views across the Site into the open countryside, which has been considered in discussion on 'Beauty' above. The contribution the Site makes in this regard will be true of any land parcel which abuts the boundary of the built-up area, and is indeed more limited at Thynne's Lane given the	See comment above.

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		land is contained by residential development to the west and south-east, with development forming part of the landscape to the east. Whilst recognising that Important View and Vista c) of made MNP Policy ENV2 runs across the Site, this does not contribute in itself to the tranquillity of the Site. Indeed, ENV2 supports development proposals which take account of Important Views and Vistas, which can be achieved through careful masterplanning of Thynne's Lane. In fact, Draft Revised Policy MNP ENV2 proposes to remove this Important View and Vista, recognising its limited significance.	
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Richness of Wildlife : The notion that the Site is an important wildlife corridor is questioned given the context of the Site and surrounding land uses. The Parish Council cite a number of species which have been observed on the Site in a series of surveys undertaken, however these surveys have not been produced in evidence supporting the MNP Review consultation and thus it is unclear whether these have been undertaken by a professional Ecologist and in accordance with recognised professional standards. Even if the list of species 'observed' on the Site is accurate, which is not clear at this stage, it is considered that a richness of wildlife has not been demonstrated given the type and nature of the species observed.	See comment above.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Continued - Criterion B / C : Thus, Bellway Homes consider that criterion b) of NPPF Paragraph 102 is failed. There is no explanation provided in the Neighbourhood Plan with regard to 20 hectares being the limit for a land parcel to be considered as not extensive, but evidentially this does not relate to any national planning policy or guidance, and clearly this is subjective based on the scale of the settlement it relates to. Thynne's Lane measures some 6.039 hectares, which Bellway Homes considers is extensive in the context of Mattishall and the purposes of a Local Green Space designation. Thus, Bellway Homes consider criterion c) of NPPF Paragraph 102 is also failed. As a result, Draft Revised Policy MNP ENV4 fails to have regard to national policies and advice and is contrary to basic condition a), and also fails to contribute to the achievement of sustainable development so is contrary to basic condition d).	It is considered that the Parish Council's approach to addressing the NPPF requirements remains appropriate having considered the explanation in the PPG (paragraph 015 Reference ID: 37-015-20140306) which states that 'there are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgement will inevitably be needed'. Therefore, having used Natural England's Accessible Natural Green Space Standards (ANGSt), a site of over 20 ha (50 acres) is likely to be considered an extensive tract of land and therefore not suitable for LGS designation. The Parish Council has reviewed all sites considered for LGS designation in relation to size and made a decision on a case-by-case

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		<p>Bellway Homes therefore respectfully requests that Site 5: Thynne's Lane is removed as a proposed Local Green Space designation in Draft Revised Policy MNP ENV4.</p>	<p>basis both in terms of size in hectares and in terms of its size in relation to the Mattishall settlement. The assessment and proposed designation remain consistent with the requirement of basic condition d). The site has distinct and clearly identified boundaries.</p>
<p>Marrons on behalf of Bellway Homes - Landowners</p>	<p>HOU1</p>	<p>Draft New Policy MNP HOU1 sets out the spatial strategy for Mattishall, namely restricting residential development proposals to land which falls within the defined Settlement Boundary where it does not comply with the limited exceptions listed in criterion 3.</p> <p>Bellway Homes consider that the MNP Review should be more proactive in supporting growth in the village to help meet current and future local needs. Breckland District Council are progressing a Local Plan Full Update which will direct growth in the District to 2046. As set out in the current community consultation which will inform the Preferred Options in early 2024, significant new housing growth will be required.</p> <p>The Government's calculation of minimum housing requirement in Breckland District derived from the Standard Method is 661 dwellings per annum, which equates to 16,525 new dwellings in the period 2021 to 2046. Whilst there may be planning permission for around 8,000 new homes in the District, land for at least a further 8,500 dwellings will have to be identified.</p>	<p>Mattishall Parish Council (the Qualifying Body) has worked pro-actively with Breckland District Council in the preparation of this Neighbourhood Plan. The Neighbourhood Plan is in general conformity with all relevant strategic policies within the adopted Breckland Local Plan.</p> <p>The Mattishall Neighbourhood Plan review has been prepared in full accordance with paragraph 13 of the NPPF ie it "support(s) the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies".</p> <p>The Parish Council is fully aware and has been mindful of the review of the Breckland Local Plan. This is evidenced in the Neighbourhood Plan's Housing Policies (Paragraph 8.8 and specifically Policy HOU1).</p> <p>This site has been submitted to the District Council's call for sites exercise (as a Local Green Space with evidence in accordance with Paragraphs 105-107) supporting the Local Plan's existing strategic policies.</p> <p>The Parish Council will make representations to Breckland Local Plan in respect of the site as a</p>

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			<p>proposed housing site at the appropriate stage in the Local Plan consultation. It is clear that there are significant constraints to this rural, agricultural site's development, and these will be set out at the appropriate time.</p>
<p>Marrons on behalf of Bellway Homes - Landowners</p>	<p>HOU1</p>	<p>The NPPF is clear that the annual requirement generated from the Government's Standard Method is the minimum number of homes needed, and that the District Council should consider whether it is appropriate to set a higher housing requirement in line with national guidance.</p> <p>This includes, for example, in order to address a significant affordable housing shortfall, to support economic development, or to address strategic infrastructure requirements which are likely to increase the number of homes needed. Breckland District Council will need to consider these factors and provide appropriate evidence in setting its housing requirement for the Local Plan Full Update, but it is noted that Breckland's latest affordability ratio is 9.25, meaning the average house price in the District is more than nine times the median gross annual salary.</p> <p>Planning for additional growth in the District and increasing the level of supply will help improve affordability for local people. Growth in the right places is also fundamental to the delivery of sustainable development in a Local Plan. It is highly likely that Mattishall will feature as an important location for growth in any Development Strategy given its high level of services, facilities and public transport accessibility, recognised by its status as a Local Service Centre. Further growth in Mattishall would also help sustain the existing thriving community.</p>	<p>See comments above.</p> <p>As previously stated, Breckland has a 6.4 year housing land supply. The Levelling Up and Regeneration Act and reflected in the December 2023 NPPF, mean that for the LPA "The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area".</p>
<p>Marrons on behalf of Bellway Homes - Landowners</p>	<p>HOU1</p>	<p>The MNP Review relies upon the fact that completions since 2021 and outstanding permissions in the Parish total 103 dwellings and that this is sufficient growth, however this is considered likely to be insufficient to meet current and future local needs. Given the above, Bellway Homes consider that the Parish Council should identify appropriate land for residential development through the MNP Review</p>	<p>See comments above.</p> <p>The Parish Council has agreed an overall "Vision" for this Neighbourhood Plan: "Mattishall will continue to thrive and, through sympathetic and sustainable development, will meet the needs of a</p>

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		<p>to ensure local people can have a meaningful say and where development will take place.</p> <p>This will also ensure that the MNP Review is not contrary to basic condition d) which requires the MNP Review to contribute to the achievement of sustainable development.</p>	<p>modern community whilst preserving and enhancing its village character and its connection to the surrounding rural landscape". The policies within the plan as a whole have been prepared on this basis. The policies have been positively prepared and the plan evidences how it contributes to delivering sustainable development.</p>
Marrons on behalf of Bellway Homes - Landowners	HOU1	<p>Bellway Homes are promoting Thynne's Lane which has been submitted to the District Council's Call for Sites exercise supporting the Local Plan Full Update, reference LPRC4SDEV307. It is considered to be a suitable candidate for allocation for residential development. The Site has no major on-site constraints which limit its development potential and it is in close proximity to the village's existing extensive range of services, facilities and public transport offer. Indeed, residential development would be complementary to surrounding land uses and would make a sizeable contribution to affordable housing provision in the area, as well as a range of market dwellings including family homes.</p>	<p>See comments above</p>
Marrons on behalf of Bellway Homes - Landowners	HOU2	<p>Draft Revised Policy MNP HOU2 seeks to introduce a requirement for all new housing to be built to M4(2) accessible and adaptable standards other than where it can be demonstrated that this would make the development unviable, at criterion 4. Bellway Homes are supportive of building to M4(2) accessible and adaptable standards where appropriate, however there may be instances where greater flexibility is required in order to meet local needs.</p>	<p>The M4 (2) – accessible and adaptable dwellings is met where a new dwelling makes provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. It is undisputed that Breckland District and Mattishall parish (see paragraph 8.23 of MNP2) have an ageing population and on this basis alone it is difficult to imagine a future where accessible and adaptable dwellings would not be appropriate.</p> <p>It is also noted that the Government has announced its intention to make this requirement mandatory as part of building regulations, in which case this clause will not be needed.</p>

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Marrons on behalf of Bellway Homes - Landowners	HOU2	Continued - Further, Bellway Homes consider that the introduction of such standards is contrary to the NPPF which is clear at Paragraph 130 f) and Footnote 49 that optional technical standards for accessible and adaptable housing should only be introduced where this will address an identified need for such properties. In the absence of such evidence, Bellway Homes respectfully considers that criterion 4 of Draft Revised Policy MNP HOU2 should be amended to encourage consideration of M4(2) accessible and adaptable standards dwellings against need and the local market, or be deleted.	See comment above.
Marrons on behalf of Bellway Homes - Landowners	HOU5	Draft New Policy MNP HOU5 seeks to introduce sustainable design and construction requirements for development proposals.	See comment above.
Marrons on behalf of Bellway Homes - Landowners	HOU5	Continued - Criterion 1 seek to require all development proposals to apply the energy hierarchy, however this is too onerous and it could be applied to any planning application, as drafted. Further, as drafted there is little clarity provided with regard to how a decision-maker should assess the steps taken by an applicant to address the energy hierarchy. As such, Bellway Homes respectfully considers that criterion 1 should be revised to encourage the application of the energy hierarchy, where applicable, or be deleted.	Noted. No change to be made, pending views of Breckland District Council at Reg 16.
Marrons on behalf of Bellway Homes - Landowners	HOU5	Continued - In addition, criterion 3 seeks to introduce the requirement for a Sustainability Statement as an additional validation requirement which all development proposals would be required to produce. As drafted, criterion 3 is both too onerous and unsubstantiated, given the considerations set out will form part of the Design and Access Statement of any qualifying development proposal and will be legislated through Building Regulations. As such, criterion 3 should be revised to encourage consideration of the requirements set out or be deleted.	Noted. See comment above.
Marrons on behalf of Bellway Homes - Landowners	Conclusion	Bellway Homes consider that a series of amendments are required to the MNP Review Pre-Submission Regulation 14 Draft before it is submitted to Breckland District Council. These are summarised below:	See Mattishall Parish Council's comments above.

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Marrons on behalf of Bellway Homes - Landowners	ENV2	Conclusion: Important View and Vista 4 should be removed as a proposed Important View and Vista.	See Mattishall Parish Council's comments above.
Marrons on behalf of Bellway Homes - Landowners	ENV4	Conclusion: Site 5: Thynne's Lane should be removed as a proposed Local Green Space.	See Mattishall Parish Council's comments above.
Marrons on behalf of Bellway Homes - Landowners	HOU1	Conclusion: the MNP should be more proactive and identify land for residential development to meet current and future local needs, particularly in the context of the emerging Breckland Local Plan Full Update, and this should include Thynne's Lane which is being promoted by Bellway Homes.	See Mattishall Parish Council's comments above.
Marrons on behalf of Bellway Homes - Landowners	HOU2	Conclusion: the proposed requirement at criterion 4 for all new housing to be built to M4(2) accessible and adaptable standards should be amended to encourage consideration against need and the local market, or be deleted.	See Mattishall Parish Council's comments above.
Marrons on behalf of Bellway Homes - Landowners	HOU5	Conclusion: the proposed requirement for demonstrating adherence with the energy hierarchy criterion 1 should be revised to encourage its application where applicable or be deleted, and the proposed introduction of an additional validation requirement Sustainability Statement should be deleted or revised to encourage consideration of the requirements set out.	See Mattishall Parish Council's comments above.
Marrons on behalf of Bellway Homes - Landowners	Conclusion	Failure to address the above will result in repeat representations being made to Breckland District Council on the MNP Review when it is consulted on under Regulation 16 of The Neighbourhood Planning (General) Regulation 2012. In Bellway Homes' view this will result in the Examiner having to make modifications before finding the MNP Review can be found to be in accordance with the basic conditions, or may even result in the Examiner finding that the MNP Review should not proceed to a Referendum whatsoever, a situation the Parish Council will undoubtedly want to avoid.	Noted. Breckland District Council Planning Policy has stated in writing to the Parish Council: The Planning Policy Team at Breckland do not have a view on these LGS designations as they do not appear to conflict with the emerging local plan and in particular the call for sites. Obviously the Parish will need to have sufficient evidence for the examination as it is

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			<p>likely that the owners will sustain an objection at the Reg 16 stage and it will be for the PC to convince the Examiner</p> <p>It will also be important for the PC to ensure that those responding to Reg 14 Plan are also informed about the Reg 16 Plan so they can respond if they wish</p>
Mattishall Golf Club - Landowners	ENV4	I am emailing you with my response to the draft Neighbourhood Plan for Mattishall. I was surprised to see that since the 2017 plan Mattishall Golf Club has been put forward as Protected Open Space. I would like to raise my objection to Mattishall Golf Club being designated as Protected Open Space, in the November 2023 draft.	<p>Noted. The Mattishall golf course is identified in the Breckland Local Plan proposals map as 'Open Space'. The Neighbourhood Plan is being consistent with that.</p> <p>The inclusion of the golf course in considered to be consistent with the policy to safeguard areas that contribute to the recreation or amenity open space provision in the parish.</p>
Mattishall Golf Club - Landowners	ENV4	In the past five years we have worked extremely hard to grow Mattishall Golf Club and have invested in excess of £500,000 to make it into the facility it is today, which I believe is a huge asset to the village. My concern with the November 2023 neighbourhood Plan is the proposed designation could have a major impact on sustaining the Golf Club and future progression of it. I believe with the investment we have made we have created an outstanding sporting facility for the village and wider community. The problem of designating this as Protected Open Space could have a significant negative impact on my business. If this space is designated it could reduce the value of the business/land which in turn could jeopardise the future of it. This designation could make it harder to continue to invest in the Club as security would be devalued. Reducing the value and going concern of the business making it harder to sustain it for the future.	Noted. See above comment.
Mattishall Golf Club - Landowners		The land which was part of the family farm holding and was developed as part of our agricultural diversification into a golf course 1991. The Golf Course remains private land.	Noted. The designation has no implication for public access/landowner responsibilities

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Mattishall Golf Club - Landowners	ENV4	Should the golf course become unviable it may need to be revert to its previous agricultural status, an example of this is The Norfolk Golf Club at Reymerston.	Noted
Mattishall Golf Club - Landowners	ENV4	I feel the designation could put the Golf Club at more risk rather than protecting it. I am totally committed to sustaining the Golf Club as a going concern but would like to raise my concern that whilst the neighbourhood plan may have good intention designating the golf club as protected open space it could in fact make it more vulnerable to sustain.	Noted
May Farm Trustees - Landowners	ENV4	We refer to your letter of 7 th November, please take this reply as our formal objection to Council seeking to place a Local Green Space designation on a piece of our land referenced by you as east of Howes Lane and north of Dereham Road identified as site 1 on your proposal.	Noted.
May Farm Trustees - Landowners	ENV4	As the landowner we cannot support this designation on our land which will place constraints on our future uses as yet unknown. It is not nor ever has been for public use, it has no public rights of way, it has no intrinsic value other than as farmland. We have other principle and moral objections to your seeking to place a lien on property that you do not own whilst purporting it to be in the public interest and which we will deal with later. We certainly understand that there is a vocal minority vested interest in pushing you to achieve it.	<p>The Parish Council has carefully considered this site against the NPPF (Paragraph 105) criteria for designation as a Local Green Space. It has been subject to a detailed objective assessment as required by the NPPF. It is considered to be of special importance to the Mattishall community, evidenced by the site assessment.</p> <p>The site is considered not to be extensive, it is local in character, being located within the village of Mattishall. Its edges are clearly defined by hedgerows/fences.</p> <p>It is located a short walking distance from all village amenities.</p> <p>In terms of meeting the NPPF criteria: Beauty: This site has been identified by the residents of the village as being a key gateway vista displaying important “beauty” characteristics and is designated as such in the adopted Neighbourhood Plan POLICY ENV2. The site is a beautiful green open space. 77% of community respondents stated that the “Beauty” of this site was important to them.</p>

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			<p>Tranquillity: Objective 1 of the adopted Mattishall Neighbourhood Plan is “to protect and enhance the rural look and feel of the village and wider parish. The site provides a pleasant view of a rural scene of agricultural land and woodland North of Dereham Road. During the adopted Neighbourhood Plan preparation process 92% of residents stated that maintaining rural views and vistas as wildlife corridors was important. 72% of community respondents stated that the “Tranquillity” of this site was important to them.</p> <p>Richness of wildlife: Seasonal nesting birds, Muntjac and Roe Deer, Hedgehogs and watervole have all been observed. The hedges are essential for wildlife cover and the ditches form good bat corridors and a food source. 80% of community respondents stated that the “Richness of its wildlife” of this site was important to them.</p>
May Farm Trustees - Landowners	ENV4	However, what IS of public interest is that if one examines not merely this site, but the whole picture of the newly proposed Green Spaces sites, it is very clear that Council have targeted every site offered to BDC in their recent call for sites.	<p>Noted. Each proposed site to be designated a Local green Space has been considered on its own merits and assessed against the criteria set out in the NPPF. The Neighbourhood Plan Open Spaces assessment has been carefully prepared following Natural England’s recommended approach, PPG Paragraphs 006-022 and NPPF.</p> <p>The Parish Council has agreed an overall “Vision” for this Neighbourhood Plan: “Mattishall will continue to thrive and, through sympathetic and sustainable development, will meet the needs of a modern community whilst preserving and enhancing its village character and its connection to the surrounding rural landscape”. The policies</p>

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			within the plan as a whole have been prepared on this basis. The policies have been positively prepared and the plan evidences how it contributes to delivering sustainable development
May Farm Trustees - Landowners	ENV4	The cumulative effect of which, together with the two existing green spaces sites at the rear of the Primary School and to the west of Denby Homes on the south side of Dereham Road, is to establish a new boundary around the whole of Mattishall to prevent any future housebuilding. (As there are no longer any sites available within the existing boundary other than small infill, this is de-facto a ban on any new homes). If this is now Council policy it is at best disingenuous not to make that publicly clear and at worst misleading by omission.	Mattishall Parish Council (the Qualifying Body) has worked pro-actively with Breckland District Council in the preparation of this Neighbourhood Plan. The Neighbourhood Plan is in general conformity with all relevant strategic policies within the adopted Breckland Local Plan. Any assessment as to how Breckland develop a future approach to strategic housing policies is purely speculative and not relevant at this stage in the NP making process
May Farm Trustees - Landowners	ENV4	So is that the real covert intention here? I saw nothing in the early consultations that made that link clearly enough to less actively informed members of the community and from whom, if it had been, might well have given a very different reaction to this plan.	Noted. The proposed Local Green Spaces have been robustly assessed, and tested with the community: Initial consultation April 2023; Regulation 14 consultation Nov-Jan 23/24.
May Farm Trustees - Landowners	ENV4	You reference certain general criteria, but that does not provide evidence that you are required to provide to show that the land is demonstrably special to the local community, of its value to and use by them, and that the land holds a particular local significance over and above many other similar pieces of land within the Parish. We therefore do not accept this proposal. Perhaps you are reserving that evidence for the forthcoming public Inspector meeting required to endorse the amended plan? In which case we will do likewise and not disclose our views further here.	The Plan includes all necessary evidence to demonstrate that the site meets the required criteria, and that it is considered of particular importance to the local community.
May Farm Trustees - Landowners	ENV4	We feel it is important to record as part of our objections the lack of openness by Council in this to date. That other than a statutory letter dated 1 st September, which noted that we are “an important stakeholder”, there has been no attempts by Council to discuss this matter with us prior to us seeing it at the first public open drop in event in April 2023. Why was that? What were you afraid of??	Noted. The Parish Council has adopted an open and transparent approach to the Plan’s preparation. All stages have been undertaken in accordance with NPPF requirements. The Plan’s development has been publicised widely including a number of opportunities for engagement. The Neighbourhood Plan has been a standing item for discussion at public Parish Council meetings.

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			Comprehensive details of all stages of the consultation will be set out, as required, in the Consultation Statement which will accompany Regulation 15.
May Farm Trustees - Landowners	ENV4	We know other landowners similarly targeted have been accorded the same discourtesy. Is it not for the party seeking to change the status quo to open early discussions and not vice versa? You are placing tanks on my lawn not me on yours.	Noted. There is no intention to be discourteous. The correct procedure has been followed at all times.
May Farm Trustees - Landowners	ENV4	We are from e-mails directly aware of those early discussions happening between Parish and District Council which is understandable, and with certain minority interests which is not, so why not with the actual landowners who you claim are "important stakeholders"? So much for consultation.	Noted. All potentially affected landowners have been notified appropriately at all stages of the plan's development (in line with NPPF guidance).
May Farm Trustees - Landowners	ENV4	Please be sure to notify us of any future developments and in particular the dates of the examination and meetings by the Inspector to ratify the new Plan.	Noted. All potentially affected landowners will be notified as the plan progresses.