

**Mattishall Neighbourhood Plan Review (2024) Reg 16**

**Summary of Comments**

**GENERAL COMMENTS**

**Please note: The Table presents a summary of representations. The full responses are also available**

<b>Reference</b>	<b>Clause</b>	<b>Comment</b>	<b>Suggestion</b>
<b>001 Local Resident</b>	<b>Whole Plan</b>	Fully support their submission as presented.	<b>No change</b>
<b>002 Local Resident</b>	<b>Whole Plan</b>	Happy with the submission version and support its adoption.	<b>No change</b>
<b>003 Local Resident</b>	<b>Whole Plan</b>	The plan fulfils the basic conditions as stated. The plan will help to preserve the unique character of the village whilst offering guidance for the sensitive developments that will inevitably arise in the future	<b>No change</b>
<b>004 Sport England</b>	<b>Whole Plan</b>	it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103.  Provides links to information on developing planning policy for sport  No comments on the Plan	<b>No change</b>

Reference	Clause	Comment	Suggestion
005 Norfolk Wildlife Trust	Policy ENV3: Trees, hedgerows and boundaries	Welcome the inclusion of the following policy wording: 'At least 2 trees should be planted, in suitable locations and as appropriate, up to an optimum level, to replace every tree that is removed. (Not suitable for ancient woodland or veteran trees as these are irreplaceable.)'	No change
005 Norfolk Wildlife Trust	Policy ENV4: Open and Local Green Space	Fully support the nine designated Local Green Spaces.	No change
005 Norfolk Wildlife Trust	Policy ENV6: Tranquillity and Dark Skies	Welcome the inclusion of the following additional policy wording:  'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats: ( <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> ). Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.	No change
005 Norfolk Wildlife Trust	Policy ENV7: Biodiversity, ecological networks and habitat connectivity	Particularly welcome the inclusion of the following suggested wording regarding the aim to achieve 20% net gain as this will provide greater confidence in genuine gains for biodiversity to aid the successful recovery of nature in Norfolk:  'In accordance with national policy provide at least a 10% increase net gain, but to ensure successful recovery of nature in Norfolk aim to achieve a 20% net gain, in biodiversity...'	No change

Reference	Clause	Comment	Suggestion
		<p>We fully support the policy wording in clause 4 and particularly welcome inclusion of the following additional wording:</p> <p>‘...opportunities should be sought to improve habitats.....this includes:</p> <p>a. improving continuity along hedgerows and between trees – this should be achieved by appropriate planting in gaps to create safe corridors of movement with good continuity and cover for wildlife moving through the landscape and reducing fragmentation of habitats;</p> <p>d. Incorporating green roofs and/or green walls to buildings where appropriate and possible.</p>	
<p><b>005</b> <b>Norfolk</b> <b>Wildlife Trust</b></p>	<p><b>Policy ENV9: Flood Risk and drainage</b></p>	<p>Support the updated policy wording with reference to the four pillars of SuDS (which includes biodiversity).</p> <p>Technical edit in clause 3: ‘...preferred method of surface water disposal on all proposals and, in line the national policy. (the word ‘with’ is missing after the word ‘line’?)</p>	<p>Amend <b>clause 3 as follows:</b></p> <p><b>: ‘...preferred method of surface water disposal on all proposals and, in line the national policy. (the word ‘with’ is missing after the word ‘line’?)</b></p>
<p><b>006</b> <b>National</b> <b>Highways</b></p>	<p><b>Whole Plan</b></p>	<p>Have reviewed the document and note that the details set out within the document are unlikely to have a severe impact on the operation of the trunk road. <b>No Comment.</b></p>	<p><b>No Change</b></p>
<p><b>007</b> <b>Local</b> <b>Resident and</b> <b>Landowner</b></p>	<p><b>Policy ENV4: Open and Local Green Space</b> <b>Site 4: Land at Rayner’s Way</b></p>	<p>The landowners, are 100% opposed to this designation.</p> <p>Have written to the Parish Council several times and to BDC through various online consultations to voice our</p>	<p><b>Delete site 4 (Rayner’s Way) as a LGS designation</b></p>

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		<p>opinions. Despite this, the Local Green Space Site Assessments for the Local Plan May 2024 states that the "owner is not aware of the application". It appears that even from a very early stage, our voices have been completely ignored and that an unconnected, unfair, autocratic process is being applied.</p> <p>This Green Space proposal is totally against our wishes; in fact, we feel this is borderline criminal - to just 'claim' a piece of private land 'for the local community' with no direct consultation or conversation with us, the landowners.</p> <p>Purchased the land in 2011 along with what used to be known as Rayners Barn, and it originally formed part of our front garden as lawn. Is it now Breckland's planning policy to go about claiming people's front gardens for the benefit of passers-by?</p> <p>In 2022, a planning application 3PL/2022/0143/O, was refused and dismissed at appeal, but the landowners are still actively working towards a fresh application by gathering more detailed flood risk and modelling information.</p> <p>Are currently working with a local, small scale, quality developer with a view to submitting a detailed full planning application in future for a quality, sympathetic, small development of 2 or 3 dwellings which will be in keeping with the rural character of the village.</p> <p>Firmly believe that, in this case, the Local Green Space Policy is being used as a weapon against development by an active minority, rather than for a legitimate</p>	

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		<p>purpose. In fact, Mattishall Neighbourhood Plan's Open Spaces Assessment, clearly evidences that our site does not score highly in importance to the local community</p> <p>The site does not meet ANY of the required criteria set out in Paragraph 106 of the NPPF which make it demonstrably special to the local community under the following categories:</p> <p><b>Beauty</b></p> <p>This is the smallest site by far of all the sites proposed in Mattishall. The land is a rectangle of grass, less than an acre in size. It is flanked by native hedging and trees. The hedging was replanted by us roughly 6 years ago and it is still growing. The hedge is now almost tall enough to screen the land entirely from view, which was the reason for planting it in the first place, to offer more privacy in our garden. Only a hedge is now visible to people passing from most angles. It therefore cannot be argued that the land contributes to character or sense of place as only a hedge is visible. The land does not make an important contribution to the physical form and layout of the village, and it does not link to any other open space or allow views to anything of significance. The hedge is not under threat, even if the land were to be developed in future, the hedge would still remain and would be managed. (Photos provided)</p> <p>According to Mattishall Neighbourhood's Plan Open Spaces Assessment document, only 66 %of community respondents stated that the "Beauty" of the site was important. This compares to</p>	

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		<p>77% for site 1  59% for site 2 (it's already designated a community space)  80% for site 3  77% for site 5  83% for site 7  80% for site 8  86% for site 9</p> <p><b>Historic significance</b>  It has none.</p> <p><b>Recreational value</b>  It has none, there is no PRow and we will never allow public access onto the land. It cannot be accessed from any public path. The only current access is off a private drive that is not in the landowners control</p> <p><b>Tranquillity</b>  The land is adjacent to the main road through Mattishall which is not tranquil at most times during the day. The traffic on Dereham Road can be large and heavy at times.</p> <p>According to Mattishall Neighbourhood's Plan Open Spaces Assessment document, only 60%of respondents felt it was an important "Tranquil" site-the lowest percentage of all the sites.  This compares to:72% for site 1  70% for site 2  77% for site 5  84% for site 7  84% for site 8  85% for site 9</p>	

Reference	Clause	Comment	Suggestion
		<p><b>Richness of wildlife</b></p> <p>In 2021 and 2022, ecology surveys were carried out on the land as part of planning application 3PL/2022/143/O. They concluded that, “No bats were confirmed as roosting during the surveys” and that “eDNA water sample analysis of two ponds located near to the site has been completed, which has confirmed GCN absence.” Therefore, ‘no impact on bats or great crested newts’. The MNP Open Spaces Assessment therefore incorrectly states that it is a roosting site for Pipistrelle bats and does not present any evidence to support this statement. It also does not provide statistics on the importance of wildlife from respondents, so we do not know the results, if there were any.</p> <p>There are 3 (not 5 as stated) TPO designated trees on one boundary which are quite impressive. They are not under threat and are not subject to any plans to be removed so LGS designation will make no difference.</p> <p>The Parish Council describes the land as a ‘wild meadow’. It is not. It is simply an overgrown lawn that used to form part of our garden. The grass has since been cut as immediate neighbours complained that it looked scruffy. We will continue to cut and maintain it as such in future.</p> <p><b>Alternative Sites</b></p> <ul style="list-style-type: none"> <li>• What has happened to Site 9, Land South and West of Ivy Way? It now no longer features in the LGS Site Assessment at all, yet this was submitted in the Mattishall Neighbourhood Plan Assessment. Why is this? This site has genuine and significant local value,</li> </ul>	

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		<p>due to its regular recreational use, wildlife ponds and public footpath. It also has significant historical value. It is an important part of a much-used circular walking route used by dozens of residents daily. Survey respondent scored it highly on ALL criteria, more than any other;  Beauty: 86%  Historic Significance: Earthworks and possible connection to the Harlestone Family Tranquillity: 84%  Richness in wildlife: 87%  Why therefore was this site not included? Out of all the sites in the Open Spaces Assessment, it is truly the worthiest of Local Green Space designation.</p> <ul style="list-style-type: none"> <li>• In addition, Site 1: Dereham Road/Howes Lane (LPR/C4S/GS/069) scores 77% for “Beauty”, 72% for “Tranquillity”, and 80% for “Richness in Wildlife”. Yet, this site has been recommended not to be considered for LGS allocation in the LGS Site Assessment, and it is stated that the tranquillity does not appear to be special to residents, despite having a higher score than ours! It also forms part of the valued Views and Vistas in the Mattishall Neighbourhood Plan of which 92% of residents stated as important to them.</li> <li>• Sites 7 and 8: respectively Land South and North of Norwich Road reinforce the rural character of the village and provide it with a valuable gateway vista when arriving from the east. These fields have already been identified by the residents as being important views and vistas and protected as designated agricultural open space. We feel that this is important that this remains the case.</li> </ul>	



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		<p>• Mattishall already has, quite rightly and fairly, designated Green Spaces in the form of Mattishall Primary School playing fields, and another site, which was negotiated from the outset with developers at the junction of Dereham Road and Old Hall Road as community orchards/woodland, allotments and play area. Both do and will serve the community very well.</p> <p>• The village has a cricket club and golf course which provide additional recreational benefit.</p> <p>Any of the above would be much more valuable to the community and appropriate as green spaces than our comparatively small piece of lawn.</p> <p><b>Conclusion</b> Paragraph 106 of the NPPF states that:</p> <p>106. The Local Green Space designation should only be used where the green space is:</p> <p>(a) in reasonably close proximity to the community it serves;</p> <p>(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>(c) local in character and is not an extensive tract of land.</p> <p>Clearly, from the survey results, it is evidenced that our land is not demonstrably special to the local community in terms of the required criteria, and that other sites</p>	

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		<p>come up much more favourably. We can only assume that LGS designation is being used as a weapon against development on this location which we are actively still engaged in.</p> <p>We cannot understand what logical rationale has been applied in the LGS Site Assessments document dated May 2024 which concludes that our land should be considered for LGS designation. Some of the facts regarding wildlife significance are incorrect (bats, newts, TPO's), and other sites which are demonstrably more special to the local community have not been recommended or even included. It therefore cannot be argued this process is fair, scientific, democratic, or based on recorded evidence.</p>	
<b>008 Historic England</b>	<b>Whole Plan</b>	<p>Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.</p>	<b>No change</b>
<b>009 Breckland District Council</b>	<b>1.6</b>	<p>The Government has published a draft NPPF alongside new mandatory housing targets that if adopted will require the District Council to make new allocations for development within Breckland. This may include Mattishall parish and the Council considers that this should be highlighted in this Neighbourhood Plan to set out the latest position.</p> <p><b>Justification</b> To ensure that the local community is aware of the review of the Local Plan and the possible need for Mattishall to accommodate new development</p>	<b>ADD TO 1.6: The District Council is currently reviewing its Local Plan. This Review will need to reflect the emerging changes to the National Planning Policy Framework and any new mandatory housing targets that will need to be met within the District. This may require new allocations to be made within Mattishall Parish</b>

Reference	Clause	Comment	Suggestion
009 Breckland District Council	<b>Objective 6 (Housing and the Built Environment)</b>	<p>It may not be possible for all future new developments to be near the village Centre. The new Local Plan may include allocations for new development within Mattishall on the edge of the village.</p> <p><b>Justification</b></p> <p>To ensure that future development is well related to the built form of the village and well connected to local services and facilities</p>	<p><b>Objective 4: To ensure that future development is near to the village centre so that our community does not need to rely on cars to access services and facilities. Development located elsewhere in the village should be well related to the built form of the village and where possible include safe pedestrian and cycle links to local facilities</b></p> <p><b>Objective repeated before para 8.1</b></p>
009 Breckland District Council	<b>Policy ENV4: Open and Local Green Space</b> <b>Site 4: Land at Rayner's Way</b>	<p>The District Council proposed this site as a LGS in its Regulation 18 Draft Local plan based on the information provided in the Assessment accompanying this Neighbourhood Plan. Following Regulation 18 consultation on the Draft Breckland Local Plan, an objection was made in respect of this site being proposed as a LGS. The Council has considered this objection and no longer consider that the site should have this designation.</p> <ul style="list-style-type: none"> <li>• The land is a private garden and is not considered to be open land and there is no public access to the land</li> <li>• The land is adjacent to the main Dereham Road and cannot be considered as tranquil (It scored the lowest of the sites included in the LGS Assessment)</li> <li>• There is already TPO protection for trees on the site.</li> <li>• The richness of wildlife is uncertain. An Ecology Survey Report considered at a 2022 planning</li> </ul>	<b>Delete site 4 from the LGS</b>

Reference	Clause	Comment	Suggestion
		<p>appeal<sup>1</sup>concluded that there remains uncertainty with regard to the potential of the site to provide habitat to reptiles and that further survey work be carried out in relation to bats and that no bats were confirmed as using trees within the site for roosting purposes.</p> <ul style="list-style-type: none"> <li>• It is understood from the landowner that the site is not a wild meadow but forms part of their private garden. It is understood that the landowner is preparing a new planning application for residential development following a refusal of permission in 2023. Whilst the District Council will consider any new application objectively, if a new proposal was considered acceptable then this proposed designation could be seen as an attempt to block possible future development on a site within the built-up area of the village on land that does not meet the requirements for designation as LGS for the reasons set out above. If any future application were to be refused, then the site would remain undeveloped but would still not meet the criteria for LGS designation.</li> <li>• It is also noted that the landowners have also objected to its inclusion within the Neighbourhood Plan and that these objections do not appear to have been addressed.</li> </ul> <p><b>Justification</b></p>	

<sup>1</sup> Appeal Ref: APP/F2605/W/22/3301662 Land to the West of Rayners Way, Mattishall, Dereham NR20 3NQ

Reference	Clause	Comment	Suggestion
		<p>The site does not meet the criteria required for its inclusion as LGS</p>	
<p><b>009 Breckland District Council</b></p>	<p><b>Policy ENV4: Open and Local Green Space Site 5: Land at Tynnes Lane</b></p>	<p>The District Council has begun a Full Update to the adopted Local Plan</p> <p>The Council notes that this site was submitted to the Call for Sites as being suitable for development. It was also proposed for designation as a Local Green Space.</p> <p>In the Regulation 18 Draft Local Plan (2024) the site was not allocated for development nor was it identified as a Local Green Space.</p> <p>The Council is aware of the current consultation on a new NPPF including a proposed new mandatory housing requirement for Breckland of 917 dwellings per annum, a 39% increase on the current figure provided for in the Regulation 18 Plan of 661 dwellings per annum. The Council has paused work on the Local Plan pending the final outcome of the new NPPF and housing figure. However, it is clear that if a new annual housing requirement similar to that currently being proposed is imposed on the District this will require a significant of the development strategy and significantly greater number of new allocations for development than previously made.</p> <p>Therefore the Council is concerned that the identification of this site as LGS at this time could be seen as an attempt to block possible future development on a site on the edge of one of the more</p>	<p><b>Delete site 5 from the LGS</b></p>

Reference	Clause	Comment	Suggestion
		<p>sustainable villages within the District.</p> <p>The Council is aware that representation have also been made on behalf of a major housebuilder that consider the site as suitable for development and also questions the sites suitability for designation s LGS.</p> <p>The District Council is not suggesting that the site is or is not a suitable development site at this time but in light of the likely significant uplift in housing requirement considers that it should be allowed to consider this site as part of the plan making process.</p>	
<p><b>009</b> <b>Breckland</b> <b>District</b> <b>Council</b></p>	<p><b>8.9</b></p>	<p>Since the Plan was published the Government has announced significant changes to the planning system and housing targets</p> <p><b>Justification</b></p> <p>Text requires updating to reflect the current situation</p>	<p><b>REWORD 8.9: The District Council has completed consultation on issues and options, the Development Strategy and a Regulation 18 consultation on its Local Plan Review. In July 2024 the Government announced major changes to planning policies, including bringing back compulsory housebuilding targets. The housing figure for Breckland is approximately 300 more per annum than that used in the recent consultations. As a result of this the Council has paused work on the review of the Local Plan until these changes are finalized and the consequences for the Local Plan and in particular the Development Strategy and allocations is known.</b></p>
<p><b>009</b></p>	<p><b>8.10</b></p>	<p>The paragraph refers to the issues and Options consultation on the new Local Plan. This should be</p>	<p><b>Amend the first 3 sentences of 8.10 as follows:</b></p>

Reference	Clause	Comment	Suggestion
Breckland District Council		<p>updated to reflect the latest stage of the plan making process</p> <p><b>Justification</b></p> <p>To reflect the latest position on the new Local Plan</p>	<p><b>The Local Plan Regulation 18 Plan did not include settlement boundaries for any settlements including Mattishall, preferring a criteria based policy approach. Mattishall Parish does not support a criteria based policy since settlement.....</b></p>
009 Breckland District Council	8.14 and MNP HOU 01	<p>8.14 Policy MNP HOU1 therefore supports, in principle, new residential development within the settlement boundary and resists development outside of it other than where certain criteria are met.</p> <p><b>Justification</b></p> <p>This approach is noted. However, it should also be noted that there may be a need for new allocations for development on sites outside the settlement boundary as part of the Local Plan Review</p>	<p><b>ADD TO bullet point 3 under point 3 of the Policy for clarification</b></p> <p><b>Sites that are allocated as part of a strategic policy in the Adopted Local Plan or those allocated as part of the Review of the Local Plan</b></p>
010 Environment Agency	Whole Plan	<p>Have no further detailed comments to make in relation to this plan.</p>	<p><b>No change</b></p>
011 Marrons on behalf of Bellway Homes	Policy MNP ENV2: Important Views and Vista 4	<p>Bellway Homes support the removal of Important View and Vista c) identified in made MNP</p> <p>Policy ENV2, recognising its limited significance. Bellway Homes do, however, object to the proposed identification of Important View and Vista 4 in Draft Submission Policy MNP ENV2. It is noted that in the Regulation 14 version of the MNP Review, Important View and Vista 4 was described as a "locally valued view looking inwards towards the settlement," but in the Regulation 16 version, it has been redefined as a</p>	<p><b>Delete Important View and Vista 4 as a proposed Important View and Vista.</b></p>

Reference	Clause	Comment	Suggestion
		<p>"locally valued view looking out over open countryside." Despite this shift in description, the location of Important View and Vista 4 has not changed, and the Parish Council has provided no explanation for altering the view's direction. Indeed, the photographic evidence provided by the Parish Council in Appendix 3 also remains unchanged. Therefore, as previously stated the view and vista is very limited in this location owing to the proximity of existing development and the tree-lined boundary.</p> <p>Bellway Homes therefore respectfully requests that Important View and Vista 4 is removed as a proposed Important View and Vista from Draft Submission Policy MNP ENV2</p>	
<p><b>011 Marrons on behalf of Bellway Homes</b></p>	<p><b>Policy ENV4: Open and Local Green Space Site 5: Land at Tynnes Lane</b></p>	<p>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 105), and is required to meet identified criteria (Paragraph 106).</p> <p>Bellway Homes consider that the proposed designation of Site 5: Thynne's Lane as a Local Green Space is contrary to NPPF Paragraph 105.</p> <p>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. Thynne's Lane has been submitted to the Call for Sites exercise supporting the Breckland Local Plan Full</p>	<p><b>Site 5: Thynne's Lane should be removed as a proposed Local Green Space.</b></p>



Reference	Clause	Comment	Suggestion
		<p>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>Designation of Thynne's 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. Indeed, the Site was submitted to the Local Plan Full Update process as a potential Local Green Space, reference 034: Thynne's Lane, Mattishall, and was not considered appropriate for Local Green Space designation in the Preferred Options (June 2024)</p> <p>.</p> <p>Bellway Homes also consider that the proposed designation of Site 5: Thynne's Lane as a Local Green Space is contrary to NPPF Paragraph 106 as the criteria set out are not adhered to. Much of the Parish Council's evidence supporting consideration of whether Thynne's 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>Full response sets out detailed comments on each criteria</p> <p>It should also be noted that the Breckland District Council Draft Local Plan Full Update Preferred</p>	

Reference	Clause	Comment	Suggestion
		<p>Options published in June 2024, designates three new Local Green Spaces are proposed in Mattishall. However, this has not included land at Thynne's Lane. As a result, Draft Submission 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). Bellway Homes therefore respectfully requests that Site 5:Thynne's Lane is removed as a proposed Local Green Space designation in Draft Submission Policy MNP ENV4.</p>	
<p><b>011 Marrons on behalf of Bellway Homes</b></p>	<p><b>Policy MNP HOU1: A Spatial Strategy for Mattishall</b></p>	<p>Breckland District Council will need to provide appropriate evidence in setting its housing requirement for the Local Plan Full Update</p> <p>Planning for additional growth in the District and increasing the level of supply will help improve affordability for local people.</p> <p>Growth in the right places is also fundamental to the delivery of sustainable development in a Local Plan. Whilst Breckland District Council's Draft Local Plan Full Update Preferred Options does not propose any new allocations for Mattishall, the village maintains its status as a Local Service Centre due to its strong services, facilities, and public transport links. Further growth in Mattishall would help sustain the existing thriving community and remains a sustainable and viable location for future development within the district.</p>	<p><b>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.</b></p>

Reference	Clause	Comment	Suggestion
		<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.</p> <p>It is further noted that the proposed revisions to the NPPF currently subject to consultation would require the Council to increase the housing requirement being planned for in the Local Plan Full Update from 661 dwellings per annum to 917 dwellings per annum in line with the revised Standard Method calculation,</p> <p>Given the above, Bellway Homes consider that the Parish Council should identify appropriate land for residential development through the MNP Review to ensure local people can have a meaningful say and where development will take place. 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>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.</p>	
<b>011 Marrons on behalf of</b>	<b>Policy MNP HOU2: Housing Types</b>	Draft Submission 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	<b>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</b>

Reference	Clause	Comment	Suggestion
<b>Bellway Homes</b>		<p>can be demonstrated that this would make the development unviable, at criterion 4.</p> <p>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>Further, Bellway Homes consider that the introduction of such standards is contrary to the NPPF which is clear at Paragraph 135 f) and Footnote 52 that optional technical standards for accessible and adaptable housing should only be introduced where this will address an identified need for such properties.</p> <p>In the absence of such evidence, Bellway Homes respectfully considers that criterion 4 of Draft Submission 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</p>	<b>consideration against need and the local market, or be deleted</b>
<b>011 Marrons on behalf of Bellway Homes</b>	<b>Policy MNP HOU5: Sustainable Design and Construction</b>	<p>Draft Submission Policy MNP HOU5 seeks to introduce sustainable design and construction requirements for development proposals.</p> <p>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</p>	<b>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</b>

Reference	Clause	Comment	Suggestion
		<p>considers that criterion 1 should be revised to encourage the application of the energy hierarchy, where applicable, or be deleted.</p> <p>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.</p>	
<b>011 Marrons on behalf of Bellway Homes</b>	<b>General</b>	<p>In Bellway Homes' view, failure to address the above 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.</p>	
<b>012 Natural England</b>	<b>Whole Plan</b>	<p>Natural England does not have any specific comments on this draft neighbourhood plan</p>	<b>No change</b>
<b>013 Local resident</b>	<b>Policy ENV4: Open and Local Green Space</b>	<p>Expresses support to protecting the green spaces of Mattishall, particularly Site 5. With an abundance of wildlife, natural beauty and footpaths, it's important this area is protected from building development.</p>	<b>No change</b>

Reference	Clause	Comment	Suggestion
<p><b>014</b> <b>Norfolk</b> <b>County</b> <b>Council</b></p> <p><b>Children</b> <b>Services</b></p>	<p><b>Policy MNP ENV4 paragraph 2</b></p>	<p>Even though some amendments have been made to paragraph 7.6 of the neighbourhood plan, the County Council would prefer to this be explicitly stated, as per the regulation 14 comments, see below.</p> <p>Policy MNP ENV4 paragraph 95 states 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on application.....'</p>	<p><b>Policy MNP ENV4 paragraph 2 should be amended to the following:</b> <b>'Development on these sites will not be acceptable other than in very special circumstances in line with national policy or the expansion of the Primary School for LGS Area 6, or where it will enhance the function of the space without compromising the principal function of the space as a Local Green Space.'</b> To ensure that any future expansion of the school is not restricted if expansion is required.</p>
<p><b>014</b> <b>Norfolk</b> <b>County</b> <b>Council</b> <b>LLFA</b></p>		<p>The LLFA welcomes that the Mattishall Neighbourhood Plan Review 2024 –2036 Submission Version April 2024 (Regulation 16) and its proposed policies retain references to flooding from various sources such as surface water and fluvial flooding and to the implications of climate change upon flood risk. It is however noted whilst reference is made within the document to groundwater flooding, no mapping has been provided.</p> <p>The LLFA note and welcome the information contained within the document relating to surface water flood risk and climate change, and in particular Policy MNP ENV9: Flood Risk and Drainage which refers to there being a number of localities within the Parish of Mattishall where localised surface and fluvial water flooding occurs and, in some locations, this can frequently be during periods of modest rainfall, which in light of climate change is likely to increase.</p>	

Reference	Clause	Comment	Suggestion
		<p>The LLFA further welcomes the re-inclusion of Objective 3 in Section 7: Environment and Landscape previously included within MNP1 to ensure new developments do not create flood risk and problems with surface water drainage.</p> <p>The LLFA particularly welcome references made in Policy MNP ENV9: Flood Risk and Drainage to ensuring new developments gives adequate and proportional consideration to their likely effect on all sources of flooding and surface water drainage and encourages the inclusion of a range of sustainable drainage features into new developments such as permeable surfaces, rainwater harvesting/storage and green roofs and walls.</p> <p>The LLFA particularly welcomes the enhancements made to Policy MNP ENV9 and supporting text relating to developments seeking to achieve the four pillars of SuDS, namely water quality, water quantity, amenity and biodiversity, with an explanation of what SuDS entails and the wider benefits of their inclusion, with references and a link now included to the role of the LLFA and its Developer Guidance document. Please note that this has recently been updated to Version 7.1 dated June 2024.</p> <p>The LLFA also welcomes the retention of references made to the Mattishall Neighbourhood Plan Document complimenting Strategic Policies within the Breckland Local Plan and National Planning Policy Framework (NPPF).</p> <p>The LLFA further welcomes references made within the supporting text for Policy MNP ENV9 to the Breckland</p>	<p><b>Update to reflect latest Guidance: Version 7.1 dated June 2024.</b></p>

Reference	Clause	Comment	Suggestion
		<p>Strategic Flood Risk Assessment (2017) which provides an assessment of the different sources of flood risk (flooding from rivers, surface water, groundwater, sewers, reservoirs, canals and other artificial sources) and recognises that Mattishall is at particular risk of flooding from rivers (fluvial flooding) and surface water, with Map 15 showing areas at risk from fluvial flooding, with Map 16 showing those at risk from Surface Water Flooding.</p> <p>The LLFA are aware of AW DG5 records within the Parish of Mattishall however, this will need to be confirmed with/by Anglian Water.</p> <p>The LLFA recommend reference be made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1' within the Neighbourhood Plan (or the relevant updated version depending on the timeframe for the preparation and adoption of the final Neighbourhood Plan document) regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the "Information for developers" section of the Norfolk County Council website.</p> <p>According to LLFA datasets (extending from 2011 to present day) we have 2 no. records of internal flooding and 12 records of external/anecdotal flooding in the Parish of Mattishall. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed</p>	<p><b>Amend to reference the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1'</b></p>



Reference	Clause	Comment	Suggestion
		<p>anecdotal and have not been subject to an investigation by the LLFA.</p> <p>We advise that Norfolk County Council , as the LLFA for Norfolk, publish completed flood investigation reports here.</p> <p>According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Mattishall.</p> <p>Whilst the LLFA note that some flood risk mapping has been included in the document, the LLFA recommend that mapping be provided for all sources of flooding, with any mapping covering the entirety of the Neighbourhood Plan Area.</p> <p>We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (in this instance it is noted that no housing allocations form part of the Neighbourhood Plan). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.</p>	<p><b>Include some mapping as sourced in Full response</b></p>

Reference	Clause	Comment	Suggestion
		<p>As was the case at Regulation 14 stage, the document proposes 9 no. Local Green Spaces which are identified in Policy MNP ENV4: Open and Local Green Spaces and Map 7: Proposed Local Green Spaces. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.</p>	
<p><b>014</b> <b>Norfolk</b> <b>County</b> <b>Council</b></p> <p><b>Minerals and</b> <b>Waste</b></p>	<p><b>Policy ENV4: Open and Local</b> <b>Green Space</b> <b>Site 5: Land at Tynnes Lane</b></p>	<p>It is noted that in response to our comment's at the Regulation 14 Consultation stage regarding Local Green Spaces "Land off Back Lane" (approximately 2.9hectares) and "Thynne's Lane" (approximately 6.1 hectares) being partially underlain by sand and gravel resource, the submission version has been amended to include a paragraph (1.7) about the Minerals and Waste Plan in the Introduction and include a link to the current Minerals and Waste Plan in a new appendix to the NP.</p>	<p><b>No change</b></p>
<p><b>014</b> <b>Norfolk</b> <b>County</b> <b>Council</b></p> <p><b>Fire and</b> <b>Rescue</b></p>	<p><b>HOU5: Sustainable Design and</b> <b>Construction</b></p>	<p>Housing developments as set out in Neighbourhood Plans can potentially change the risk profile for the area and increase attendance times to incidents. Increases in population place additional demand on fire and rescue resources, both in terms of the need for additional capital investment in new facilities and vehicles and funding for additional equipment based on increased risks. This also impacts revenue budgets for</p>	<p><b>No change</b></p>

Reference	Clause	Comment	Suggestion
		<p>firefighters, officers, and support staff. NFRS dynamically reallocates resources across the county to meet changes in risk and demand.</p> <p>HOU5: Sustainable Design and Construction - NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments.. Developments which include PV arrays, Domestic Energy Storage Systems (DESS) and electric vehicle charging points should comply with national guidance and Institute of Engineering and Technology Codes of Practice. Developers should consult with NFRS both before and during planning stage on safe installation and location within residential dwellings.</p>	
<p><b>014</b> <b>Norfolk</b> <b>County</b> <b>Council</b>  <b>Highways</b></p>	<p><b>Policy ENV4: Open and Local Green Space sites 8 &amp; 9 – Dereham Road junction with Parkers Road</b></p>	<p>The proposed Policy ENV4 locations 8 &amp; 9 – Dereham Road junction with Parkers Road are on dedicated highway land. The Highway Authority objects to these LGS designations as they could be seen as conflicting with the powers of the Highway Authority and could be used to frustrate operations within public highway.</p>	<p><b>Delete sites 8 &amp; 9 – Dereham Road junction with Parkers Road as LGS</b></p>

