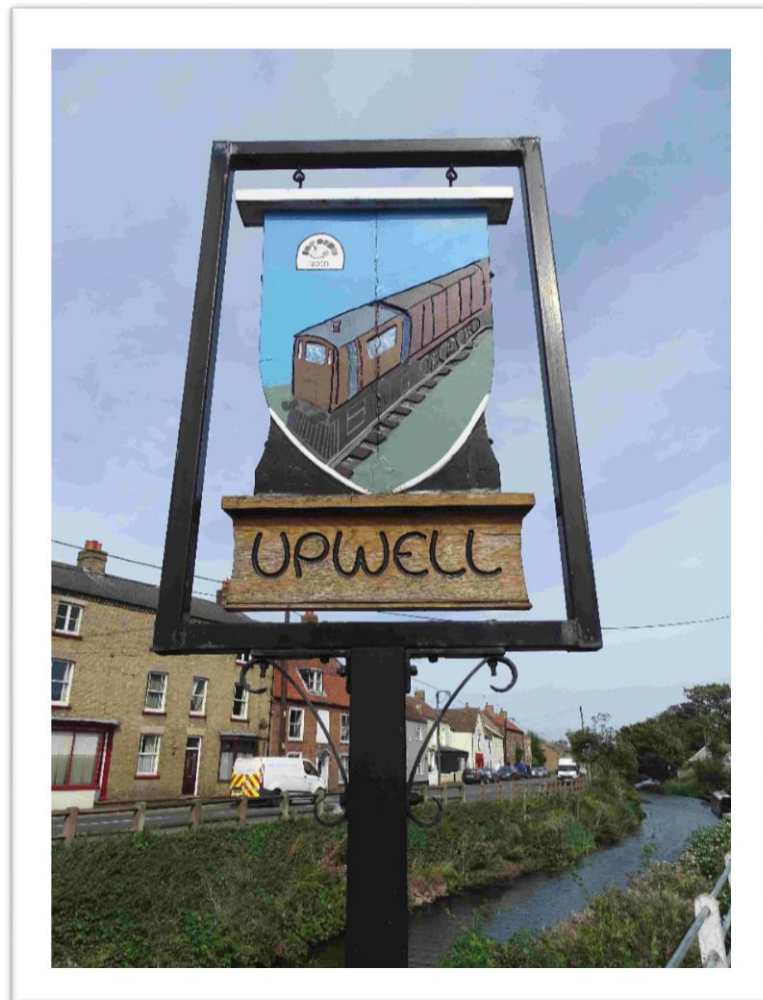


# UPWELL PARISH NEIGHBOURHOOD PLAN

## STATEMENT OF COMMUNITY INVOLVEMENT



Prepared by the Neighbourhood Plan Steering Group

September 2019

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## 2 INTRODUCTION

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This Statement of Community Involvement (SCI) has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out what a SCI should contain:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted;
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:

- a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area
  - i. details of the proposals for a neighbourhood development plan;
  - ii. details of where and when the proposals for a neighbourhood development plan may be inspected;
  - iii. details of how to make representations; and
  - iv. the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
- b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its neighbourhood plan, and ensure that the wider community:

- is kept fully informed of what is being proposed;
- is able to make their views known throughout the process;
- has opportunities to be actively involved in shaping the emerging neighbourhood plan;  
and
- is made aware of how their views have informed the draft neighbourhood plan or Order

### 3 CONSULTATION AIMS

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**The aims of the Upwell Parish Neighbourhood Plan consultation process were:**

- to 'front-load' consultation, so that the Plan was informed by the views of local people from the start of the neighbourhood planning process;
- to ensure that consultation events took place at critical points in the process where decisions needed to be taken;
- to engage with people using a variety of events and communication techniques; and
- to ensure that results of consultation events were analysed, fed back to local people, and used to inform the next stage in the development of the neighbourhood plan.

## 4 WHO WAS CONSULTED, AND HOW

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Consultation was undertaken by the Upwell Parish Neighbourhood Plan Steering Group, under the auspices of Upwell Parish Council. Following designation of the entire Parish as the area to be covered by the Neighbourhood Plan, consultation events took place at the following stages in the neighbourhood planning process:

### 4.1 SPRING 2016

#### January – May 2016 ‘Have your Say’ meetings

Five consultation events were held throughout the Parish

- 16<sup>th</sup> January and 16<sup>th</sup> April in Three Holes Village Hall
- 20<sup>th</sup> February and 19<sup>th</sup> March in Upwell Village Hall
- 21<sup>st</sup> May in Lakesend

Residents were invited to fill in a questionnaire asking for their opinion on how the Parish should develop over the next 20 years or so, given that NO development was not an option.

### 4.2 AUTUMN 2016

Since the response was from a limited number of residents (60) it was decided to follow up these meetings with a further questionnaire in the autumn 2016 edition of the Upwell Parish Council Community Magazine. This quarterly publication is free of charge and was hand delivered to the majority of properties in the Parish. Additional copies were made available in the public buildings and shops.

### 4.3 SPRING/SUMMER 2017

In the spring and summer of 2017 meetings were held with numerous community groups and other bodies in order to develop the evidence of community concerns and priorities. These included local businesses, the Middle Level Commission and the Internal Drainage Board, the Welle Creek Trust, young people’s groups including the older children at Upwell Academy and the Girls’ Brigade, social clubs with adult and senior members and on an internet forum ‘Nextdoor’. Events were attended including the school fete and the annual Playing Field Gala.

### 4.4 AUTUMN 2017

The information collated from these consultations was put to the community in the autumn of 2017 at a series of ‘Policy Ideas workshops’. ‘Drop-in’ sessions were held in all three village halls: Lakesend

Saturday 21<sup>st</sup> October, Three Holes, Tuesday 24<sup>th</sup> October and Saturday 4<sup>th</sup> November and Upwell  
Sunday 29<sup>th</sup> October 2017.

## 5 COMMUNITY CONSULTATIONS AND THE MAIN ISSUES RAISED

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
<p>Access to larger towns with greater range of services and jobs is very poor, partly due to distance and public transport availability.</p> <p>Likely to be linked to low use of sustainable transport modes for getting to work, low level of skills, and increasing unemployment, especially amongst young adults</p> <p>Quite high levels of deprivation generally in parts of the parish</p>	<p>There will be a need to support existing businesses and services and encourage the provision of additional services, shops etc</p> <p>Ensure broadband and mobile phone signal is enhanced to encourage new businesses to the Parish, especially at Three Holes.</p> <p>The plan will support small businesses and start-ups, possibly allocating land, especially in Three Holes</p> <p>Support tourism opportunities</p>	<p>High level of agreement with business support and broadband/mobile provision</p> <p>Re provision of land for business at Three Holes, it was more mixed with many disagreeing. Was it the specific reference to Three Holes that prompted disagreement?</p> <p>High level of agreement on promotion of tourism policies</p>	<p>Develop a policy on improving broadband and mobile reception</p> <p>Have a more general policy supporting small businesses and start-ups, rather than allocating</p> <p>Maybe look to improve access to work elsewhere, such as through community transport or kickstart, or a village car share scheme? Not really planning related though</p>



Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
	<p>Promote the attraction of Welle Creek and other waterways.</p> <p>Provision of marina</p> <p>Promote the heritage and history of the village, e.g.</p> <ul style="list-style-type: none"> <li>• Ancient buildings and monuments.</li> <li>• The Upwell/Wisbech tramway.</li> <li>• Eel catching, ice skating, wild fowling, Fens dialect</li> </ul>		Develop tourism policies
Access to larger towns with greater range of services is very poor, partly due to distance and public transport availability	There will be a need to support existing businesses and services and encourage the provision of additional businesses, services and shops etc	High level of agreement	Develop policy on protecting services/ businesses and encouraging greater service and business provision locally, including tourism
Low levels of active transport (walking and cycling) could have health	Preserving and enhancing the waterways whilst also encouraging access to and use of them and	High level of agreement on leisure recreation policy proposals and improving footpaths, cycling etc	Develop policies on these themes

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
<p>implications. Health deprivation is modestly poor (bottom 30%).</p>	<p>promote access to the surrounding countryside.</p> <p>Support existing community and recreational facilities, particularly for young people, and encourage further provision of such facilities</p> <p>Improve and extend footpaths to promote safe walking within the Parish.</p> <p>Encourage cycling as a means of transport and recreation.</p>		
<p>Very few environmental constraints, at least in terms of nature conservation. Although a low practicable flood risk, most of parish is in high flood risk zone and dependent on drainage systems.</p>	<p>Make sure that existing flood prevention measures (e.g. dykes/ditches) are retained and not detrimentally affected by future developments.</p>	<p>High levels of agreement for both</p>	<p>Use as the basis for policies on flood risk</p> <p>Flood risk a key issue for site allocations, and so sites would need to be assessed</p>

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
Sequential test will apply if allocating sites.	Ensure flood zone maps in Three Holes and Lakes End are updated and kept up to date.		
Housing is very eclectic and mixed, which is part of the character of the parish	<p>New residential development should be of an appropriate density, height, design and layout, including for parking, which complements and reflects the existing style and character and general environment within the parish</p> <p>Ensure that any development along Welle Creek is very sympathetic in scale and design to the existing river frontage.</p> <p>There will be a presumption against larger developments, especially estate type development.</p>	High level of agreement with preserving character and general environment, especially along Welle Creek, and against estate type developments. Agreement with public realm and on-site parking policies	<p>Develop policies, perhaps ensuring that developments over a certain size (5 dwellings?) provide a mix that is in keeping. So new developments should not be homogenous.</p> <p>Policy might need to emphasise that this is especially important along Welle Creek.</p>

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
	<p>Support improvements to the quality of the public realm/ open spaces in the villages</p> <p>New developments should provide adequate on-site parking</p>		
Landscape very flat with long views	<p>New residential development should be of an appropriate density, height, design and layout, including for parking, which complements and reflects the existing style and character and general environment within the parish</p> <p>Try to preserve views into the landscape</p>	High level of agreement	<p>Housing mix and design will be important</p> <p>Sites allocated will need to retain views</p>
Generally linear pattern of development along key roads in the	New residential development should be of an appropriate density, height, design and layout, including for	High level of agreement with all	Sites should not be too large

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
<p>Parish and the Creek in Upwell, offering long views over fens</p>	<p>parking, which complements and reflects the existing style and character and general environment within the parish</p> <p>Ensure that any development along Welle Creek is very sympathetic in scale and design to the existing river frontage.</p> <p>New housing should be infill, small (less than 5 units) or medium.</p> <p>There will be a presumption against larger developments, especially estate type development.</p>		<p>Policies for sites should say something on type of housing and design</p>
<p>Housing stock has been changing in the direction of larger homes with more rooms/ bedrooms, at a time when the need is for smaller dwellings with fewer rooms/ bedrooms</p>	<p>We would like to see developments provide a mix of houses and would encourage affordable homes as well as dwellings suitable for younger people</p>	<p>Broad agreement for mix, but some disagreement too</p>	<p>Word policy carefully. Maybe rather than having a presumption against larger homes, could require that in any development of 5 homes or more, a certain</p>

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
	<p>and older people. Smaller dwellings of 2 or 3 bedroom are especially needed.</p> <p>There will be a presumption against very large homes</p>	<p>Lot of disagreement with proposal against larger homes</p>	<p>proportion of dwellings need to be no more than 2 bedrooms.</p> <p>Policy could say that proposals for development of 10 or fewer homes that include affordable, that this will carry significant weight in favour? At the moment, such proposals do not need to include any affordables.</p> <p>Consider a policy on affordable housing on rural exception sites</p>
<p>Ageing population, especially very old age groups (75-84)</p>	<p>We would like to see developments provide a mix of houses and would encourage affordable homes as well as dwellings suitable for younger people and older people. Smaller dwellings of 2 or 3 bedroom are especially needed.</p>	<p>Broad agreement for mix, but some disagreement too</p>	<p>Could require that in any development of 5 homes or more, at least 20% of dwellings need to be single storey (and so suitable for older people)</p>

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
Very high-quality agricultural land	Prioritise land not in agricultural use?	positive support.	<p>This is quite an issue and it might need a policy, though it doesn't have to.</p> <p>Encourage development on brownfield or plots not used (or which can't be used commercially) for agriculture</p> <p>Development over a certain size could have a sequential test to show that the only option is to use agricultural land</p>
Upwell is growing proportionally faster than the borough, so increasing pressure on greenfield land and infrastructure. Forecast to continue growing as a Key Rural Service Centre	<p>New development should not overburden existing infrastructure, nor require infrastructure out of keeping with the village.</p> <p>Support improvements to the quality of the public realm in the villages</p>	<p>High level of agreement with infrastructure policy, and public realm</p> <p>Broad agreement about a new school, but some disagreement too.</p>	<p>Any larger development might need to show that there is capacity in flood defences/ sewage etc</p> <p>Have a policy on CIL projects</p> <p>Policy supportive of new school</p>

Issues (mainly from evidence base)	Relevant Policy Options	Level of support from issues and options consultation	Response
	<p>Upwell School dates from 1878, enlarged 1909. The main building has come to the end of its lifespan and needs to be replaced with a modern building designed for the needs and aspirations of the 21st century and the number of children likely to attend as the village expands. We would therefore support in principle the provision of a new school</p> <p>Encourage the community to identify suitable projects for CIL monies.</p>	<p>High level of agreement on CIL projects</p>	



## 5.1 SPRING 2018

In the 2018 spring edition of the Upwell Parish Council Community Magazine a 'call for sites' was advertised, inviting landowners to put forward sites for housing development that were either brownfield sites or land unviable for agricultural purposes.

This consultation closed on 22<sup>nd</sup> June and following independent and professional analysis of all the sites submitted, an open consultation was held on Saturday 29<sup>th</sup> September, in Upwell Village Hall, for residents to view and comment on the sites and on a number of local green spaces that had been identified as suitable for designation in the plan. Sites for residential development were assessed against a range of criteria such as highway access, sustainable access, heritage impacts, impacts on the natural environment etc. This can be seen in a separate document. The Highway Authority was also invited to comment, and its responses are shown at Section 5.2 below, which also shows all of the sites assessed.

Their comments were noted and incorporated in the Draft Plan that was submitted for Pre-Submission consultation.

The detail of comments on the sites and local green spaces are presented at in the Appendix at Tables 1 and 2. Regarding the potential housing sites, the steering group considered that the obvious ones to allocate would be sites 5 (60 St Peter's Rd), 6 (Pinfold Rd) and 12 (next to Three Holes Village Hall). Site 4, Lode House also got a majority in favour.

However, taking a conservative approach as to what these 3 sites would deliver, the steering group realised that these would not deliver the required housing. Some of that 45 dwellings required could plausibly be windfall, but reasonable assumptions on this still left a significant shortfall, and so further sites would be needed.

Some sites could clearly be rejected because of the factors against, such as sites 2, 3, 7, 8, 9, 10, and 11, where there was either a large majority against and/ or concerns about deliverability. This left sites 1 and 13, as these were potentially deliverable (especially site 1) and the majority against was less. The steering group decided that the focus should be on site 1 but with less housing than originally proposed. Site 1 scored more favourably than site 13. The steering group considered whether some of site 13 could plausibly be allocated for mixed use and recreation, including a marina, but with potentially enabling housing development. Eventually because of the uncertainty as to what would be needed on the site in terms of enabling housing development, it was decided to have this as a policy rather than an allocation

## 5.2 SITES ASSESSMENT SUMMARY TABLE WITH HIGHWAY AUTHORITY COMMENTS

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
Site 1 – Low Side. 30-35 dwellings				<p>Site ref is 681</p> <p><i>Comment 2012 site allocations</i></p> <p><i>3. This allocation is remote from the key services of settlement. The Highway Authority would object if this site were included in the plan.</i></p>	The site has good access to local services and has access to footways
Site 2 – Pius Drove, nr telephone exchange				<p><i>Comment 2012 site allocations</i></p> <p><i>2. Subject to a safe access and local improvements being made to the footway network the Highway Authority would not object if this site were included in the plan.</i></p>	However, this site is only a portion of site 636, has no access to Pius Drove and Back Lane is unsuitable, so the site is unacceptable.

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
Site 4 – adjacent Lode House, Low Side. 3 Dwellings				<p><i>Comment 2012 site allocations</i></p> <p><i>3. This allocation is remote from the key services of settlement. The Highway Authority would object if this site were included in the plan.</i></p>	site is not remote from services
Site 5 – rear 60 St Peter's Road. 8-15 dwellings				<p><i>Comment 2012 site allocations</i></p> <p><i>2. Subject to a safe access being made the Highway Authority would not object if this site were included in the plan.</i></p>	Further evidence is required to determine if safe and suitable access could be achieved.
Site 6 – Pinfold Road. 3-5 dwellings				<p><i>Comment 2012 site allocations</i></p> <p><i>2. This allocation is remote from the key services of settlement. The Highway Authority would object if this site were included in the plan.</i></p>	site is not remote from services

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
Site 7 – Green Road				<p><i>Comment 2012 site allocations</i></p> <p><i>3. This allocation is remote from the key services of settlement.</i></p> <p><i>The Highway Authority would object if this site were included in the plan.</i></p>	
Site 8 – Pius Drove, organic connections				<p><i>Comment 2012 site allocations</i></p> <p><i>2. Subject to a safe access and local improvements being made to the footway network the Highway Authority would not object if this site were included in the plan.</i></p> <p>However, this site is only a portion of site 636, and on the information available it is not clear that a safe and suitable access can be formed within the land promoted. Further evidence is</p>	<p>However, this site is only a portion of site 636, and on the information available it is not clear that a safe and suitable access can be formed within the land promoted. Further evidence is required to determine if access could be achieved.</p>

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
				required to determine if access could be achieved.	
Site 9 – rear of 4a New Road				<i>Comment 2012 site allocations</i> <i>2. Subject to a safe access being made the Highway Authority would not object if this site were included in the plan.</i>	It is not clear that a safe and suitable access can be formed within the land promoted. Further evidence is required to determine if access could be achieved.
Site 10 - Mill Rig off March Riverside				<i>Comment 2012 site allocations</i> <i>3. The surrounding highway on very narrow and is not appropriate for this allocation. The Highway Authority would object if this site were included in the plan.</i>	Agreed
Site 11 – Bardyke Bank. 5 dwellings				<i>Comment 2012 site allocations</i> <i>3. This allocation is remote from the key services of settlement. The Highway Authority</i>	Agreed

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
				<i>would object if this site were included in the plan.</i>	
Site 12 – next to Three Holes village hall. Five dwellings				<p>The site is likely to have been screened out because of flood risk and proximity so there are no previous comments on this site.</p> <p>The site is remote and Squires Drove is unsuitable because of its width and substandard junction with the A1101. The site is not suitable for allocation.</p>	<p>Agree that it is a little remote, but some development is needed at Three Holes to support the vitality of the community. Allocate smaller site outside of flood zone.</p> <p>Junction can be brought up to standard.</p>
Site 13 – Dovecote Farm				<p><i>Comment 2017 HELAA</i></p> <p><i>It is suggested that both sites could use the existing farm access. It would appear that the existing access is narrow and unsuitable. Development over 8 units would require an adopted access which would require the widening of the existing including structures over the drain. There is no evidence to demonstrate that this could be achieved. With the scale of</i></p>	<p>Agreed that this could be an unsuitable site for significant residential development</p>

Colours indicate planning agent's assessment	Highways	Sustainable access	Conclusion	Highway Authority Comments	Response from Steering Group/ Agent
				<i>development there is concern over the adequacy of the local road network and the standard of the footpath link to the settlement on the opposite side of Dovecote Road.</i>	

## 6 REGULATION 14 PRE-SUBMISSION CONSULTATION – SPRING 2019

### 6.1 SPRING 2019

This consultation ran from Monday 8<sup>th</sup> April to Friday 24<sup>th</sup> May.

- The Draft Neighbourhood Plan was published on the Upwell Parish council website and advertised on the front cover of the Spring edition of the Community Magazine (see image below) as well as the home page of the website.
- Hard copies were provided to Upwell Village Hall, Three Holes Village Hall, Joanne's Pantry, the Five Bells Inn and Rav's Fish and Chip shop.
- Comments were invited by email or in writing.

The image shows the front cover of the 'Spring 2019' Community Magazine. At the top left, it says 'Spring 2019' in a yellow banner. In the center is the Upwell Parish Council logo, which features a swan and the text 'Upwell Parish Council'. To the right of the logo is a photograph of white flowers. Below the logo, the title 'Community Magazine' is written in a large, red, serif font. On the left side of the cover, there is a table of contents titled 'Inside this issue:' listing various articles and their page numbers. The main content of the cover is a green rectangular box with white text. The text in the green box reads: 'Your Upwell parish Neighbourhood Plan', 'UPWELL PARISH NEIGHBOURHOOD PLAN REGULATION14 PRE-SUBMISSION CONSULTATION', 'MONDAY 8TH APRIL – FRIDAY 24TH MAY 2019', 'THE DRAFT NEIGHBOURHOOD PLAN AND ASSOCIATED DOCUMENTS WILL BE AVAILABLE ON THE UPWELL PARISH COUNCIL WEBSITE WWW.UPWELL.PARISH.COM/NEIGHBOURHOOD PLAN', 'COMMENTS MAY BE MADE BY EMAIL TO neighbourhoodplan@upwellparish.com', 'HARD COPY WILL BE AVAILABLE DURING THE 7 WEEK CONSULTATION PERIOD AT THE FOLLOWING LOCATIONS AND TIMES:', 'UPWELL VILLAGE HALL MONDAYS/WEDNESDAYS/FRIDAYS 2.00-4.00 P.M. TUESDAYS 9.30-11.30 A.M.', 'THREE HOLES VILLAGE HALL MONDAYS/THURSDAYS 7.00-9.00 P.M.', 'A COPY WILL ALSO BE AVAILABLE FOR INSPECTION AT: THE FIVE BELLS INN RAV'S FISH AND CHIPS JOANNE'S PANTRY NORMAL OPENING HOURS WILL APPLY', 'COMMENTS MAY BE MADE TO THE EMAIL ADDRESS GIVEN ABOVE OR IN WRITING TO THE NEIGHBOURHOOD PLAN COMMITTEE C/O THREE HOLES VILLAGE HALL SQUIRES DROVE, THREE HOLES WISBECH PE14 9JY'. At the bottom left of the cover, there is a red dashed box containing the text: 'Copy Date for Summer Edition is Friday 25th May'.

The following consultation bodies were contacted by email or in writing and asked to comment either by email or by post c/o Three Holes Village Hall by the closing date of Friday 24<sup>th</sup> May.

- Norfolk County Council (Stephen Faulkner): [stephen.faulkner@norfolk.gov.uk](mailto:stephen.faulkner@norfolk.gov.uk)



- Fenland District Council - info@fenland.gov.uk
- Cambridgeshire County Council - info@cambridgeshire.gov.uk
- Cambridgeshire and Peterborough Combined Authority - contactus@cambridgeshirepeterborough-ca.gov.uk
- outwell pc: Debbie Newton, outwellpc@btinternet.com
- welney pc: clerk@welneypc.org.uk
- emneth pc: c/o kate bennett, emnethparishcouncil@hotmail.co.uk
- nordelph pc: c/o kate bennett , nordelphparish@hotmail.com
- christchurch pc: clerk@christchurchparishcouncil.org.uk
- Elm and Friday Bridge pc: clerk@elm-pc.org.uk
- Now Homes England (HE)- enquiries@homesengland.gov.uk
- Natural England - consultations@naturalengland.org.uk
- Environment Agency - planning\_liaison.anglian\_central@environment-agency.gov.uk
- Historic England - eastplanningpolicy@historicengland.org.uk
- Highways England - planningee@highwaysengland.co.uk
- CTIL (Vodafone and Telefonica) - EMF.Enquiries@ctil.co.uk
- MNBL (EE and Three) - Public.Affairs@three.co.uk
- EE - public.affairs@ee.co.uk
- Three - william.comery@ericsson.com
- West Norfolk CCG - contact.wnccg@nhs.net
- Upwell Health Centre – stephen.reeves@nhs.net
- UK Power Networks - enquiries@ukpowernetworks.co.uk
- Anglian Water - sPatience@anglianwater.co.uk
- Community Action Norfolk - office@communityactionnorfolk.org.uk
- RSPB – mike.jones@rspb.org.uk
- CPRE - info@cprenorfolk.org.uk
- Welney Wetland Trust info.welney@wwt.org.uk
- Norfolk Chamber of Commerce – membership@norfolkchamber.co.uk
- New Anglia LEP - info@newanglia.co.uk
- GCGP LEP - info@gcgp.co.uk
- NFU john.newton@nfu.org.uk
- Oddfellows, Alison Adamson, alison.adamson@oddfellows.co.uk
- West Norfolk Disability Forum - Rebecca Parker, rebecca.parker@west-norfolk.gov.uk

- AGE UK info@ageuknorfolk.org.uk
- Water Management Alliance/KLIDB, info@wlma.org.uk
- Middle Level Commissioners - enquiries@middlelevel.gov.uk
- Churchfield & Plawfield IDB - enquiries@middlelevel.gov.uk
- Upwell IDB - enquiries@middlelevel.gov.uk
- Needham & Laddis IDB - enquiries@middlelevel.gov.uk
- Nordelph IDB - enquiries@middlelevel.gov.uk
- Sport England - funding@sportengland.org
- HSE Local - PLANS.CEMHD.5@hse.gov.uk

The following were also contacted in writing:

- Age Concern Luncheon Club
- British Legion Local Branch
- BT Group
- E.A.S.S.
- EDF Energy
- Norfolk Constabulary
- Scout Group
- Upwell Methodist Church
- Upwell St Peter's PCC
- Upwell Health Centre Patient Participation Group
- Welle Creek Trust

A copy was also sent to the Local Planning Authority.

Replies were received from the following:

- Historic England: no comment
- Natural England: no comment
- Anglian Water – sensible and constructive suggested amendments
- Anglian Central, Environment Agency – approves flood risk elements
- KLWNBC repeated previous criticism and request meeting (see separate table)
- P. Cronk Goodley's agent. Numerous objections
- Middle Level – sensible constructive comments

- HSE – no comment as no nuclear reactor
- Equality Advisory Support Service (by post) – nothing to do with them
- Andrew Harrison – water butts and rainwater conservation
- Grahame Seaton/WCT – support Marina
- Dr Paul Williams WNCCG – more should be done, policy wise, to promote the use of and access to public/sustainable transport. Housing for the elderly. Health centre/pharmacy has more than adequate capacity.
- Candy Richards – concern re impact on her property of proposal for Allocation 1
- Lucia Hedderley – plan will not stop overdevelopment
- Alison Adamson, Oddfellows – acknowledgement but comment not forthcoming.
- Three – automatic reply but no comment
- Fenland D.C. – ditto

The responses from Anglian Water and Middle Level Commissioners are shown below.

<b>Regulation 14 responses</b>		
Rep	Suggested response	Comments
<b>Anglian Water</b>		
<p>We would ask that Policy EN1 refers to all source of flooding including from sewers and emphasise that Sustainable Drainage Systems (SuDs) would be the preferred method of surface water disposal.</p> <p>It is therefore suggest that the following wording or similar should be included all of the allocation policies and Policy LR1:</p> <p>‘Provide evidence on foul and surface water flood risk and it’s management;’</p> <p>It is therefore suggests that Policy EN1 be amended as follows:</p> <p>‘New developments must provide evidence accompanying all planning applications relating to the risk of flooding from all potential sources to show that proposed developments will not adversely</p>	<p>Suggest we use their suggested wording</p>	<p>See also IDB and BC comments about IDB being a statutory consultee</p>

<b>Regulation 14 responses</b>		
Rep	Suggested response	Comments
<p>affect existing flood prevention measures and that new development will not increase the risk of flooding on site or elsewhere off-site.</p> <p>The evidence to be provided will include the proposed method of foul and surface water drainage and any required mitigation including the use of Sustainable Drainage Systems (SuDS) for surface water management wherever feasible.'</p>		
<p>There is an existing foul sewer which crosses the site.</p> <p>Where sewers are located within allocated sites there is need for the site layout to be designed to take these into account.</p> <p>We would therefore suggest that the following wording be added to the policy A1:</p> <p>'The suitable access is maintained for drainage infrastructure'</p>	Add suggested text	
<p><b>Planning Policy P1: Physical Infrastructure</b></p> <p>Anglian Water is supportive of Policy P1 as it states that planning permission will only be granted if it can be demonstrated that there is sufficient infrastructure capacity for the proposed development.</p> <p>To be effective it suggested that this policy is amended to make it clear that capacity is currently available or can made available through a reliable mechanism. As there will be circumstances in which sewerage infrastructure capacity is not currently available but can made available in time to serve the development.</p> <p>It is therefore suggested that Policy P1 is amended as follows:</p>	Include text as suggested	Legally, infrastructure providers are obliged to provide the capacity to meet the needs of planning permissions.

<b>Regulation 14 responses</b>		
Rep	Suggested response	Comments
New major development must demonstrate that it will not overburden existing infrastructure and that <del>ample capacity remains</del> <b>is available or can be made available to serve the development.</b>		
<b>Middle level commissioners</b>		
Policy ET2 – economic development Include reference to impact on flood risk and navigation on the waterways	Include	
Reduce HGV use of roads adjacent to waterways	Already something in the supporting text, so no changes needed	
Supporting text of policy ET3 on tourism Include text on the Risk Management Authorities (re flood risk) needing to be involved in discussions	Include something in supporting text	
Community Action 2 on tourism assets Include in supporting text that eels are a protected species, that licences can be issued by EA, but that the EA has indicated that no new licences will be issued	Remove references to eel catching	
Policy LR1: Leisure, recreation and a marina Middle Level Commissioners would like to be involved in discussion before any application made	Include in supporting text	
Planning Policy EN1: Flood Risk and Prevention IDB does not have the resources to be a statutory consultee	Remove references from the policy and from the supporting text	The BC also suggested this should be removed
Community Action 3: Maintenance of flood defences Note that under common law landowners have the primary responsibility for draining their land	Include something about working with landowners as well as the authorities	

<b>Regulation 14 responses</b>		
Rep	Suggested response	Comments
<p>Planning Policy H3: Design</p> <p>It is suggested that a viable water level and flood risk scheme is included that meets current design standards</p>	<p>Not relevant to this policy, but could include something with policy EN1 on flood risk</p>	
<p>Planning Policy P1: Physical Infrastructure</p> <p>Asked for clarity on whether this could include flood risk infrastructure</p>	<p>Yes it could do, so add something to the supporting text as it is already in the policy</p>	
<p>Planning Policy P3: Walking</p> <p>Where possible, new footways should be positioned outside of any protected watercourse and maintenance access strips. Involved RMA where possible in discussions</p>	<p>Include some text in policy or supporting text</p>	
<p>Planning Policy P4: Local green spaces, and Section 7 on LGS designations</p> <p>Blunts Orchard – A Churchfield and Plawfield drain forms the southern boundary of the site.</p> <p>A new flood risk management system could provide a positive outcome for habitat and amenity</p> <p>Three Holes Riverbank – Not public space or public footpath so remove from list</p>	<p>Re Blunts Orchard – add to text</p> <p>Three Holes riverbank – LGS designation does not need to be public space. The designation does not encourage use, it simply protects from development</p>	
<p>Community Action 4: Community Infrastructure Levy</p> <p>Infrastructure should be positioned outside of watercourse maintenance access strips</p>	<p>Add text to this effect</p>	
<p>Policy A3 – St Peter’s Road</p> <p>Some suggested changes to supporting text on the circumstances that could cause the waterway to overtop</p>	<p>Reflect suggestions in the supporting text</p>	
<p>Appendix A – character</p> <p>Some suggested changes, but nothing important</p>	<p>This is background evidence, but could make some suggested changes</p>	

<b>Regulation 14 responses</b>		
Rep	Suggested response	Comments
Members of public – need buffer around A1 site to prevent amenity impact on neighbours	Add to policy text	
Members of public – Include need for water butts in flood risk policy	Add text	
Members of public – support walking, cycling etc	No changes	

The feedback from the borough council is presented in the Appendix at Table 3.

## **6.2 SUMMER 2019**

Following revision to take into account the comments submitted by the consultees, a meeting to discuss the revised document was held on Wednesday 17th July with Planning Officers from Kings Lynn and West Norwich Borough Council.

Following which the Pre-Submission document was further revised prior to Submission to the Borough Council for a 'health check'

## 7 APPENDICES

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7.1 TABLE 1: PAGE 29: COMMENTS PUT FORWARD FROM COMMUNITY REGARDING SITES IN UPSWELL

7.2 TABLE 2: PAGE 37: ANALYSIS OF COMMENTS REGARDING LOCAL GREEN SPACES

7.3 TABLE 3: PAGE 38: KLWNBC OFFICER FEEDBACK



SITE No.	SITE Name	Positive comments	Neutral Comments	Negative comments
1	Land South of Low Side	Small development of 2-3 bed units if only a few homes -so not to spoil area		This is Grade 1 agricultural land , once lost can't be replaced Do not want estates just a few homes Would rather not have de here at all Increase traffic?? Parking concerns
2	land North of Pius Drove to rear of telephone exchange	only if possible access to Pius Drove is significantly upgraded		Too much already in this area Loss of Grade 1 agricultural land Access to narrow already busy road may be dangerous No building on grade 1 agricultural land - there are other sites with better potential Totally unsuitable for development, Pius Drove ruined already road is unsuitable Pius Drove over developed already no pathways no suitable road access Local roads unsuitable - ?possible flood risk
3	The Myrtles - land adjacent			Too much development around here already NO! Blatant profiteering. Not suitable for de. Should be a thriving small business site Road is unsuitable Loss of Grade 1 agricultural land Pius Drove not suitable for large development
4	Lode House - adjacent land			Low Side not built to take more traffic 1-2 units only

				Loss of heritage area - thought this had already been refused
5	Land rear of 60 St Peters Rd	Ideal cul-de-sac, but smaller units 2-3 bed only		No to large developments
		Already a brownfield site so no loss of agricultural land		No more small houses. No more shared ownership of drives. Ridiculous entrance to road
		Small affordable housing with minimal amount of larger homes		Flood risk increased car use, road unsuitable
		Approve but only 2-3 houses		
		Loss of HGVs on this road a major benefit - although aren't there enough new homes already?		
6	Land East of Pinfold Road	Restrict number of units. Low occupancy to reduce number of cars. Starter homes/older people's bungalows	2-4 bed units only	Access too small.
				Access not suitable at either end of road
				Access bad for traffic
				Road will not take extra traffic
				Increased flood risk
				St Peter's road unsuitable for extra traffic
7	Land West Green Road		If road structure better then OK	Increased flood risk
			Better development of pre-fab sites opposite seems more sensible	Stonehouse Rd unsuitable for increased traffic

			Access prevents development unless we are now approving development on single track roads. If so then nice site??	Access not good , road very narrow
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				Loss of Grade 1 agricultural land, access restrictions
				Not suitable for large development
				If you can't get cars off-road do not build
8	Land adj Staatsberg Pius Drove			More grade 1 agricultural land!!
				If all developments on Pius Drove approved then traffic onto Pius Drove would be excessive
				Pius Drove not suitable
				Road too narrow for traffic - problems already
				No - until you change Pius Drove junction with Town Street - far too much development for this site
				Bad access to junction at main road - floor risk
				Keep cars off road or don't build
9	Land to rear of 4a New Road	Good site, local to village all in walking distance to village services		Bad access onto an already busy road

		Good site, local to village shops, school, doctors		Too close to bridge and junctions
				Without widening of pavement this would be an accident black spot
				Access? Historic area? Residents would complain about noise from village hall
				New build next to village hall - NO!
				No access - already in congested area. Too close to church, Welle Manor, centre of village
10	Mill Rigg			Not suitable. All surrounding lanes not suitable for development.

				March River Side not suitable now for pedestrians. Not suitable for extra traffic from large estate
				About the only decent footpath for walkers. Traffic too fast along riverside
11	Goose's Field, Bardyke Bank			NO! Grade 1 agricultural land yet again
				Against development because:- road unable to manage further traffic; loss of agricultural land; unsuitable for houses due to bungalows being overlooked;
				Narrow road, will affect access
				Unsafe road for multiple cars
				Unsuitable facilities
				Road not suitable for more traffic

				Protected species may be harmed
				Access to main road not a good idea and Bardyke Bank couldn't cope
				Too busy on main road
				Total rural destruction, too isolated, no access , no services
				Road unsuitable for traffic
				House development unsuitable in this area
				Effect on wildlife (deers, owls and much more - protected species)
				Not suitable as away from all services and too rural
				More people more noise development will devalue property, detrimental to wildlife. Road unsuitable for more traffic. Grade 1 agricultural land
				Main road already busy. More traffic will make cross roads more dangerous

				Destroying nature's habitats, protected species in local drains e.g water voles and bats
				Open views destroyed, no longer a rural home
				Lack of local facilities, shops doctors etc

				Previous applications already refused due to being out-of-character and in green belt land
				Very busy main road at cross roads. Spoil outline of village. Better areas to development than on such a dangerous road
				Loss of agricultural land; traffic; changes to community life; ecology destroyed (deer, bats, owls); unsafe roadway to add traffic to; bungalows characterise the area - houses would not be in keeping
				village boundary Three Holes + Upwell
				Any attempt to improve the road would make us virtually prisoners in our own homes unable to access the A1101
				Bardyke Bank is a single track road - no passing places. Put into serve a single row of houses. Any additional traffic would make it impassable
				Houses would look directly into our bungalows and destroy our outlook and development will devalue our homes
				Stress and worry to existing elderly residents in Bardyke Bank
				Not a good location, Road not suitable. Agree with other comments

12	Adj to Three3 Holes Village Hall	Better location than other suggestion in Three Holes		No - grade 1 agricultural land yet again
		Good site, with off road parking		
		Good site to deliver development without ruining look of village		
		Build along side but not at back of Paradise Farmhouse - give them the option to buy the land behind them		
		Better site than other options		
		Good site for 3 Holes		
		Better location than other suggestion in Three Holes		
		Excellent site need more building in Three Holes		
		Some building needed in Three Holes and Lakes End		
		Extra Parking for village Hall		
13	Land adj Dovecote Farm	This would transform the mix of housing in the area		Dovecote Road is far too busy with all the bends. Access poor
		Needs careful planning could be an asset to the village		Problems with access, drainage, main sewer. Public right of way
		If marina went ahead would be benefit		Query - public footpath? Dovecote Road unsuitable for more traffic
				Too far out of village envelop. Loss of Grade 1 agricultural land

				If marina built would need new Marmont Priory Lock. Road not suitable for more traffic
				No development whatsoever on this site. What will happen when business resembles marinas in other areas (Ely/Littleport). All full of boats no body uses. Messy businesses. Water pollution. End up as scrap yard.
				Totally unsuitable. No services as access opening on bad corner. No other access
				Marina was applied for many years ago near lock but was not thought viable. As would need lock gates putting in as a risk of flooding.
				Whoever seeking this approval ought to address the issues already identified. Not rocket science
				Looks viable but needs appropriately experienced people dealing with it



Table 2: Analysis of community feedback on Local Green spaces

SITE Name	Positive comments	Neutral Comments	Negative comments	Natural Beauty	Historic	Recreational value	Tranquil	Ecology
Blunt's Orchard	21	0	0	Y	Y	Y	Y	Y
Upwell Playing Field	28	0	0	N	N	Y	N	N
Townley Close - Tram route	13	0	1	N	Y	Y	N	Y
Upwell Hall Gardens	13	0	0	Y	Y	N	Y	Y
Lakesend Playing Field	4	0	0	N	N	Y	N	N
Lode Avenue 2 greens	13	0	0	N	Y	Y	N	N
Methodist church gardens	13	0	0	Y	Y	Y	Y	Y
Small lode Morton's farm to Pingle	13	0	0	Y	Y	Y	Y	Y
Three Holes Riverbank	16	0	0	Y	Y	Y	Y	Y
Village Sign site Three Holes	9	0	0	N	Y	N	N	N

Table 3: Kings Lynn and West Norfolk Borough Council comments and Steering group responses

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
	Front Cover	The plan period is clearly stated on the front cover. However this should state that the plan period began in 2015 when the Neighbourhood Plan Area was designated. The end period could be 2036 to align with the Borough Council's Local Plan review.	Amend accordingly re start date, but continue with 2038 end date
	Layout	Overall the plan laid out in a logical way and the policies are clearly distinguishable from supporting text.	
	Flooding	The borough council has recently published a new Level 1 Strategic Flood Risk Assessment (SFRA) and is shortly to publish Level 2 which focuses on specific communities including Upwell. We are more than happy to share this information with the parish council.  Site assessments mention surface water flooding, but what about other sources? What flood zone are the sites actually in? Climate change etc..?	The new SFRA level 1 was used (Dec 2018), and this was the reason for some of the delay in consulting. SFRA 2 won't provide any particular useful additional info on a parish or site-specific basis  Site assessments do mention fluvial flood risk. This wasn't always carried over into the policy for each site, notably where it was flood risk

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		<p>You're seeking all applications to be commented upon by the Internal Drainage Board, what have they said in regard to the proposed site allocations, also what have the Environment Agency and Norfolk County Council as the Lead Local Flood Authority said?</p> <p>The IDB are not statutory consultees therefore can you insist that they are consulted?</p>	<p>zone 1. We do need to be clear in the site policies which type of flood risk we are talking about, so this needs to be tightened up.</p> <p>Environment Agency felt that the document was consistent with flood risk policy. Nothing from LLFA. Some useful information has been provided by the IDB re Site A3 on St Peter's Road</p> <p>Amend accordingly. Turns out they don't want to be consulted anyway</p>
	Historic Environment	<p>It is disappointing to see that this appears to either have been ignored or not treated appropriately. This is especially given the rich heritage offer within the parish. There is little mention of the following:</p> <ul style="list-style-type: none"> <li>• The Upwell Conservation Area</li> <li>• High number of Listed Buildings</li> </ul>	<p>There is no NP policy on the historic environment, and there is no such requirement. NPs only need to cover those policy areas that they choose. It was felt that national policy and local plan policy would be sufficient.</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		<ul style="list-style-type: none"> <li>There is also a significant number of unlisted heritage assets, described as buildings of historic interest within the conservation map /statement</li> </ul> <p>Little regard to these assets appear to have been given for example the character/area statement barley mentions the historic environment and the site assessments have little regard to them.</p>	<p>A number of policies refer to the importance of the historic environment.</p> <p>The character assessment aimed to capture the overall character, not just the historic character. There was little point in repeating any conservation appraisal.</p> <p>All site assessments took into account the historic environment.</p> <p>Where relevant, policies for sites (such as A2) refer to the conservation area. Nevertheless, applications will need to comply with policies in the NPPF and local plan that deal with the historic environment. Some site specific policies can be amended to make clearer references to conservation area etc</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
	Maps	Good to see the maps produced by the borough council have been put to good use. This aids the clarity of the plan.	
10	Vision, Aims & Objectives	Well written and structured.	
12	Policies - Introduction	Some of the policies within the Site Allocations and Development Management Plan (SADMP) are strategic ones.	Note and refer to as appropriate in the NP
13	ET1: Communication	This appears to accord with the latest version of the NPPF with regard to communications. However, do you mean all new development as a residential extension / new agricultural storage building is development and should these demonstrate how they will contribute to the achievement of fast broadband connections?	Include the term 'where relevant'? Can change to "all new residential and commercial development".
14	ET2: Economic Development		
14	ET3: Tourism	Should the list in community action 2 actually form part of the policy?	We decided it didn't need to, but happy to be advised otherwise. Is the cross-reference not sufficient? Amended as suggested anyway
15	LR1: Leisure, Recreation and Marina		

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
16	LR2: Open and Community Space	It is considered that this policy (and supporting text – which reads as a policy) as written may not be appropriate. Given that it is different from the Local Plan policy. What is the justification and proportional evidence to suggest a departure? Is what you're seeking appropriate given the scale/size of developments and the viability?	Amend policy to accord with local plan policy
17	LR3: Cycling	<p>This is good area to cover i.e. the use of healthy and sustainable transport. Could be worth including map with cycle routes in the plan. What do you mean by new development? Residential and business?</p> <p>Some development may not be able to achieve this nor would it make sense if it did, such as a barn for storage or a new garage for example What do the site allocations you are seeking to make provide in relation to this policy?</p>	<p>Make some clarifications</p> <p>Good point re how this relates to site allocations. Could require Site A1 to make tramway a walking and cycling route. Alternative could be shared surface at the front to the site. Not sure other sites could provide cycle routes.</p> <p>change to “all new residential and commercial”.</p>
17	EN1: Flood Risk & Prevention	<p>Should this say that planning applications where appropriate should be accompanied by a site specific flood risk assessment? i.e. make the development safe for its lifetime / not increase the flood risk to others etc.....</p> <p>Are the proposed allocations acceptable in terms of flood risk? Please see earlier comments on Flooding.</p>	<p>Make appropriate changes</p> <p>Policy and supporting text already make clear an FRA is required. Should be no need to repeat national and local policy about lifetime and increasing flood risk elsewhere. All allocations have been assessed for flood</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
			<p>risk against SFRA Level 1 – see attached.</p> <p>Sites are acceptable in terms of flood risk.</p>
18	EN2: Agricultural Land	<p>Most of the allocations seem to have met the policy criteria by simply providing housing. If this is all that is required with regard to community benefit, is the policy worth inclusion? As any site which provides a house or housing would therefore meet the requirements.</p>	<p>This policy seeks to provide preferences for PDL and land not in agricultural use or viable for such use, so as to continue to protect as much ALC1 as possible, without unduly stifling development in the Parish.</p> <p>Sites A2, A3, and A4 are not agricultural land (they are not used for agricultural production). Site A1 could be seen as delivering over-riding benefits in terms of affordable housing and protecting/ using the tramway, and site A5 will deliver parking for the village hall.</p>



Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
19	Housing	<ul style="list-style-type: none"> <li>• The Local Plan (2001 - 2026) makes provision for at least 70 new dwellings through site allocations in Upwell and Outwell, as they are classed as jointly as a Key rural Service Centre. 4 of which are within Upwell for at least 30 dwellings and 2 are in Outwell for at least 40 dwellings.</li> <li>• We would have been looking for in the region of 67 new dwellings across Upwell and Outwell for the period 2016 - 2036 this is based upon the way of calculating housing need at the time, Full Objectively Assessed Need, which was 670 dwellings per year across the Borough.</li> <li>• Earlier this year the Government concluded on how Local Housing Need should be calculating, following this standard method contained within the National Planning Policy Framework 3 and updated Planning Practice Guidance through the need for the borough overall is 555 new homes per year. Following through our preferred method of distribution this results in the need through either the Local Plan review or Neighbourhoods Plans for Upwell and Outwell to provide at least 30 dwellings. As this Neighbourhood Plan seeks to provide a slightly higher number this is considered to be acceptable as it shouldn't impact upon the strategic direction of growth or the strategic allocations.</li> <li>• Outwell Parish Council are also preparing a Neighbourhood Plan for their area and the allocation of housing there will be up to Outwell Parish Council not the Borough Council as we aim to support communities like your good self who</li> </ul>	<p>Update supporting text</p> <p>The reduced housing need does provide an opportunity to reduce the number of sites being allocated, but steering group is keen to support housing, so will stick with numbers and allocations.</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		wish to prepare a Neighbourhood Plan for their Area	

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
20	H1: Scale and Location	<ul style="list-style-type: none"> <li>Does this include allocations made previously in the SADMP?</li> <li>How do the allocations you propose for allocation within the neighbourhood plan relate to brownfield sites and land not in agricultural use?</li> <li>What is the reason for the size restrictions, i.e. 5 / 25 dwellings?</li> <li>Please be aware of entry level exception sites as introduced by the revised NPPF para. 71. This could clearly mean that development which isn't compatible with the policy could come forward and should be supported.</li> <li>The plan doesn't seem to have considered the development boundaries, are the current ones acceptable – might</li> </ul>	<p>Doesn't affect existing allocations made in adopted plans. The supporting text refers to "over and above existing allocations..."</p> <p>Only A3 is on brownfield.....no other appropriate brownfield sites came forward during the Call for Sites. A2 and A4 are not in agricultural use.</p> <p>This is simply the preference, for small to medium sized sites. Re infill, this relates to gaps that are relatively small. Could an infill accommodating 20 dwellings be considered as infill? There are examples of adopted NPs with the '5' threshold for infill sites</p> <p>This is what is allowed for in the NPPF and so to have a policy contrary to this would be contrary to the NPPF. However Policy H2 does provide some criteria for such schemes</p> <p>No plan to amend the development boundaries. These have been left to the local plan. Include map and explanation</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		be worth including a map of these within the neighbourhood plan	
21	H2: Housing Mix	Entry level and affordable housing seems to be muddled together.	Amend to clarify
22	H3: Design	The NPPF encourages neighbourhood plans to explore and consider polices on design. Would the approach you are suggesting stifle innovation, and prevent new technologies including renewables and building methods?  Have you considered building materials?	The policy does not require new development to be identical. Design can complement and enhance. Add additional text though

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		How have the site allocations been treated in relation to this policy?	<p>Did not want to be too restrictive on building materials</p> <p>Site allocations will need to have regard to this policy</p>
23	H4: Residential car parking standards	<p>These are higher than the Norfolk County Council parking standards, which are repeated in the Local Plan.</p> <p>What is the justification for this, robust proportional evidence to support this may be required.</p>	<p>NCC standards impose a maximum. This is contrary to the NPPF and so is out of date.</p> <p>The evidence is around car ownership, which is high, poor public transport accessibility, and the level of local services and facilities. These factors suggest that car ownership will be seen as essential. Add this to supporting text</p>
24	P1: Physical Infrastructure		
25	P2: Primary School		
25	P3: Walking		
25	P4: Local Green Space	Good to see a policy of this nature and that it is justified	

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
	Proposed sites for Allocation	<ul style="list-style-type: none"> <li>• Some of the sites are rather large and only have a small number of houses attributed to them. Make the best use of land? You could provide the area of the site</li> <li>• It is unclear how the sites have contributed to the other policies within the plan</li> <li>• There is little within the policies with regard to the historic environment – what do they need to do and what assets including settings might be impacted upon.</li> <li>• The summary table differs from the detailed assessment; scoring and conclusions aren't always consistent, mainly on issues of greenfield/brownfield and heritage. It isn't always clear if a site would be acceptable on highways grounds (access and infrastructure).</li> </ul>	<p>Check densities It would be useful to have the site areas. Request this from the borough council</p> <p>Add text where appropriate</p> <p>Improve references where relevant, such as sites A2, A3 and A4.</p> <p>Amend where appropriate</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
28	A1 – Low Side	<ul style="list-style-type: none"> <li>The affordable housing element is higher than policy requirement? Is this justified, what is the evidence to suggest this is appropriate?</li> <li>Why must it be delivered in three phases? The assessment of the site suggests that it is split into two phases to encourage small builders.</li> <li>The assessment mentions a policy limit of 20 dwellings, but the policy states 'at least'. If the site is capable of being built out with higher numbers (30/35 mentioned) and still being policy compliant, do you not want to make the most use of the site, especially given that it is classed as Grade 1 agricultural land?</li> <li>Needs to say more about Flood Risk (and from all sources) SSFRA.</li> </ul>	<p>This is at least partly to make up for the fact that other sites (such as A2 and A4) are small and so will not contribute. Also to help meet the high need for affordable housing in the parish and local area. Landowner is willing BC agreed this was ok in subsequent meeting</p> <p>It could be two or it could be three. It is just a choice to promote for smaller builders. This is encouraged by national policy. Want to avoid larger estate type development. Change to two.</p> <p>The aim is to have a good amount of community open green space, retention of views, and buffers with neighbours. Also, it appears to be a similar density to G104.3 for 5 dwellings. There is no need for additional housing.</p> <p>There is only one small amount of surface flood risk and this is mentioned. Augment text though</p>

Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
		<ul style="list-style-type: none"> <li>You perhaps need to mention that part of the site is already allocated within the SADMP</li> <li>What have NCC as the local highway authority said about the site?</li> <li>Is there the opportunity to use the old tramway as a footpath/cycle route?</li> <li>Is the policy expectation with regards to the treatment of the old tramway achievable?</li> </ul>	<p>Yes, should do</p> <p>No formal response. Previous informal response was <i>“This allocation is remote from the key services of settlement. The Highway Authority would object if this site were included in the plan.”</i> We disagreed.</p> <p>Good idea, as long as it would prove useful. Include something in policy</p>



Borough Council Officer Level Comments on the Reg. 14 Upwell Neighbourhood Plan (April / May 2019)			Comment/ responses
Page	Item	Comment	
31	A2 – Lode House	<ul style="list-style-type: none"> <li>This site has an extensive planning history including appeals which have been dismissed. Impact upon the historic environment (conservation area and listed buildings) has been a key element to these decisions. How do you propose to address these concerns, given that the assessment mentions a risk to deliverability?</li> </ul>	The appeal decisions were reviewed and it was concluded that it would be a matter of design etc. Concerns addressed through limiting to 3 dwellings and having a clear policy. Further augment policy wording though
33	A3 – St Peter’s Road	<ul style="list-style-type: none"> <li>Is the site deliverable? Given that it appears, based upon the information in the plan, to be being used currently. The assessment raises doubts over the ownership of the current/proposed driveway for access and this would raise deliverability issues, unless this issue has now been clarified?</li> <li>What have NCC as the local highway authority said about the site?</li> <li>Flood Risk – if further investigation is needed can it be allocated? The assessment raises concerns of flood risk to the access to site and the potential need to secure pedestrian evacuation through the graveyard and the need to secure this with the borough council?</li> </ul>	<p>Landowner is willing</p> <p>These doubts have been addressed by the landowner</p> <p>No formal response. Earlier informal response, <i>“Subject to a safe access being made the Highway Authority would not object if this site were included in the plan.”</i></p> <p>The further site specific FRA is really just to clarify exactly which parts of the plot need to be avoided etc as being in fluvial zones 2 or 3. Only a small area showing on northern boundary. We have been reassured on flood</p>

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			risk at site access, including through the IDB response which generally agreed with the statements made.
35	A4 – Pinfold Road	Have you spoke with Norfolk County Council as the local highway authority regarding access and the local road network? The assessment doesn't clarify if access is achievable and it also mentions that road widening might be necessary. Is it? And if so can this be achieved?	<p>No formal response, but earlier informal was, <i>"This allocation is remote from the key services of settlement. The Highway Authority would object if this site were included in the plan."</i> We disagreed.</p> <p>The road is narrow and that is a bit of a constraint, certainly re the scale of any development on Pinfold Road. Suggest widening along frontage</p>
37	A5 – Adjacent to Three Holes Village Hall	Perhaps the policy needs to show which area is suitable for the housing and which part is to be the carpark. Can access be achieved as envisaged by the policy as the site appears not to be connected to the road specified (Squires Drove)?	<p>Will consider this, thanks.</p> <p>Access is a legal matter rather than planning. However, been reassured that landowners are willing.</p>